Telecommunications Relay Service
Application for Renewal of Current Certification
Virgin Islands

Submitted to:
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Submitted by:
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VIRGIN ISLANDS TELECOMMUNICATIONS RELAY SERVICE
APPLICATION FOR RENEWAL OF CURRENT STATE CERTIFICATION

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TAB 1

Introduction

This is an application on behalf of the Virgin Islands Public Services Commission ("VIPSC") to have the Virgin Islands Telecommunications Relay Service be certified as a Telecommunications Relay Service pursuant to the rules and procedures set forth by the Federal Communications Commission. The Virgin Islands have been certified for the last certification time period beginning July 26, 2003.

Official notices, documentation and correspondence related to this application should be directed to:

Mickey Breton
Director of Business Offices
Innovative Telephone
PO Box 6001
Charlotte Amalie
St. Thomas, USVI 00804
Phone: (340)-715-8349

Operational questions about the center may also be directed to the following:

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Vice President of Relay
Hamilton Relay, Inc.
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Aurora, NE 68818
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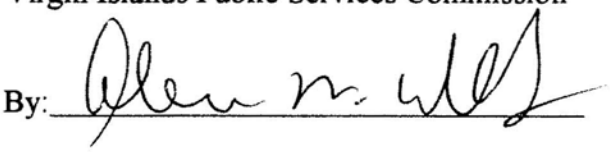
Request for Renewal of Current State Certification

Wherefore, VIPSC requests that the Federal Communications Commission certify the Virgin Islands Telecommunications Relay Service provided through Hamilton Telephone Company in Aurora, Nebraska.

Virgin Islands Public Services Commission

By: 

TAB 2

TRS Contract Status

Hamilton Telephone Company d/b/a Hamilton Telecommunications is operating the Virgin Islands Telecommunications Relay Service under contract with Innovative Telephone. The term of the contract is effective August 1, 2005 through August 25, 2008.

Hamilton provides TRS service for the Virgin Islands from a center located at 1006 12th Street, Aurora, Nebraska 68818.

The Virgin Islands Telecommunications Relay Service provides relay users with a complete relay service package which includes all features and services as listed in Appendix A of this filing, including a "self-learning" database that captures speed of equipment for each customer on the first initial call through the relay. Error Correcting software, Carrier of Choice, a variety of call types using VCO and HCO, a customer profile database and much more are part of the Virgin Island's relay package. Training for Communication Assistants is continual.

TAB 3

Operational Standards

47 C.F.R. § 64.604 - Mandatory minimum standards.

The standards in this section are applicable December 18, 2000, except as stated in paragraphs (c)(2) and (c)(7) of this section.

(a) Operational standards—

(1) Communications Assistant (CA).

(i) TRS providers are responsible for requiring that all CAs be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities.

(ii) CAs must have competent skills in typing, grammar, spelling, interpretation of typewritten ASL, and familiarity with hearing and speech disability cultures, languages and etiquette. CAs must possess clear and articulate voice communications.

(iii) CAs must provide a typing speed of a minimum of 60 words per minute. Technological aids may be used to reach the required typing speed. Providers must give oral-to-type tests of CA speed.

The Virgin Islands Telecommunications Relay Service requires Communication Assistants to be sufficiently trained to effectively meet the specialized communications needs of individuals who are deaf, hard of hearing, and speech impaired. Virgin Islands Relay Communication Assistants also have competent skills in typing, grammar, spelling, interpretation of type written American Sign Language, and familiarity with hearing and speech disability cultures, languages and etiquette. Before taking the first call, Communication Assistants are prepared to relay calls in a fashion that exceeds FCC standards. Below Virgin Islands Relay demonstrates how it hires and trains its CAs to meet the proficiency standards stated above.

The following exams are given to each applicant before hiring to ensure that the candidate has the needed skills to become a fully trained Communication Assistant:

(1) Spelling test (must achieve at least 90% correct)
(2) Reading skills (must be able to read clearly and distinctly)
(3) Typing test

Spelling Skills

The minimum spelling skills required of Virgin Islands Relay Communication Assistants is the ability to quickly and easily spell words that are equivalent to that of a beginning college level conversation. The spelling skills exam includes words that are a part of the 12th grade spelling level. Communication Assistants must pass a spelling exam to be eligible to work for Virgin Islands Relay. Following is a sample spelling test an applicant must pass before being hired as a Virgin Islands Relay Communication Assistant.

Spelling Exam

Name:_____ Date:_____

Circle the correct spelling.

1.	COPERATION	COOPERATION	COPPERATION
2.	REFFERRAL	REFERAL	REFERRAL
3.	BUSNESS	BUSINESS	BUSSINESS
4.	BROCHURE	BROSHURE	BROUCHURE
5.	POSABLE	POSSIBLE	POSSABLE
6.	INSURANCE	ENSURANCE	INSURENCE
7.	SUBSCRIPTSION	SUBSCTIPTTION	SUBSCRIPTION
8.	CATALOG	CATILOG	CATOLOG
9.	CUSTOMER	COSTAMER	CUSTUMAR
10.	SUBMITED	SUBBMITTED	SUBMITTED
11.	ANSER	ANSWER	ANSWUR
12.	ADDRESS	ADDRES	ADRES
13.	EXTINTION	EXTENSION	EXTENSIEN
14.	LITATURE	LITERATURE	LITERITURE
15.	RECEIVE	RECIEVE	RESEIVE
16.	SORCE	SOURCE	SOARCE
17.	IMFORMATION	INFORMATIEN	INFORMATION
18.	PHYSICAL	PFYSICAL	PHISYCAL
19.	COMMITMENT	COMMITTMENT	COMITTMENT
20.	PRAIRE	PRAIRIE	PRARIE

Basic Skills in Reading, Speaking, and Writing English

Virgin Islands Relay Communication Assistants must meet all necessary grammar proficiency requirements including reading, speaking, and writing English grammar prior to employment. Communication Assistants are required to demonstrate English grammar skills at a minimum of a 12th grade level. Virgin Islands Relay tests for these skills, diction, clear and articulate voice communications, and a neutral accent by requiring each prospective CA to complete the reading exam which follows:

Reading Exam

> There is a new wind blowing through the quality profession. It is bringing some very different messages to those of us who manage and support the quality functions of our organizations. These messages tell us about quality in ways that are hard to reconcile with our traditional understanding of quality. They are messages like "quality is customer satisfaction" or even "quality is customer delight"; "quality people do quality work" and "quality is the expression of human excellence."
>
> We have difficulty with the messages because, as one quality professional noted, "I don't know how to develop specifications from these ways of thinking about quality. "It is a real dilemma because our history and technology have been built upon our ability to specify, measure, and control. As long as these specifications have been based on objectively measurable phenomena like length, weight, hardness, frequency, etc., we can set standards and develop control procedures based on these standards. Now we are confronted with a way of understanding that is expressed as customer satisfaction or even customer delight. How are we to translate this into specifications and standards?

Ability to TYPE at 60 wpm

Virgin Islands Telecommunications Relay Service Communication Assistants must TYPE 60 words per minute. Virgin Islands Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level in addition to 60-wpm typing. Virgin Islands Relay has calculated average typing speed and accuracy in its Relay Center. The Virgin Islands Center has an average typing speed of 69.08 wpm with 97.34% accuracy.

Virgin Islands Relay administers pre-hire tests to determine the typing speed and accuracy of each applicant. This testing procedure is designed to identify applicants who have the ability to reach 60 wpm with a 95 percent accuracy level within a three-week training period. Virgin Islands Relay CAs must pass an oral-to-text typing test at a 60-wpm level with 95 percent accuracy in order to take calls on the relay floor. Virgin Islands Relay subtracts all errors to calculate typing speed.

Virgin Islands Relay makes use of a computer based typing program for enhancing keyboarding, spelling and grammar skills. This is a program that Communication Assistants can enter at various levels and continue to progress and is a very effective method of self-improvement. Virgin Islands Relay has made computers and space available in all of our centers for Communication Assistants to use this software. Virgin Islands Relay also conducts regular typing tests. Virgin Islands Relay tests its CAs every four months in a manner which simulates actual working conditions to document current proficiency levels of the Communication Assistants and to make sure CAs are making progress over the term of their employment.

Initial Training

The training schedule used by Virgin Islands Relay can be found in Appendix B. A great deal of time is dedicated throughout the training process to instruct Communication Assistants on the proper phrasing of typed ASL "gloss" and grammar, tone of voice, hearing and speech disabled cultures, TTY etiquette, pertinent information about the needs of deaf, hard-of-hearing and speech impaired users, the role of the CA, and operation of relay telecommunications equipment including answering machines and computerized services. This is done through videos, training seminars with staff who are familiar with the deaf and speech disabled communities, observation, both simulated and live calls, and a variety of role play scenarios. Virgin Islands Relay CAs are well trained to effectively meet the specialized needs of hearing and speech-disabled individuals as explained below.

All newly hired employees undergo training in the areas of American Sign Language syntax and grammar, deaf/speech impaired culture, and ethics and confidentiality before considered a fully functional employee.

Virgin Islands Relay uses a variety of trainers throughout its training period. The Virgin Islands Relay provider has a Training Coordinator who is responsible for the overall program. This person performs all classroom training and leads role-play activities. In addition, Hamilton Relay's outreach employees and Communication Assistants all play a role in training. Outreach employees teach relay user culture while Communication Assistants share general knowledge about the relay and assist with role playing activities.

CAs are introduced to basic ASL training during the first three weeks of employment. The fundamentals of ASL training include in-depth information on the deaf syntax, culture, and basic limited signing.

In addition to basic training during new hire training, Virgin Islands Relay hosts several on-site classes throughout the career of each CA related to refreshing and expanding information learned in the initial training classes.

In order to become a STS CA, an individual must pass the same tests as traditional CAs, meet the strict STS criteria and pass an STS exam. Once a CA has been accepted into the STS Program, he/she receives specialized STS training.

During the training, STS CAs learn about speech disabilities and are given specific strategies to use in order to facilitate calls between STS users and end users. STS CAs also receive detailed training on STS policies and procedures. As follow-up to the initial training, the STS Program Supervisor continually educates all STS CAs on speech disabilities, their respective implications and etiquette, through the use of a STS newsletter, STS Resource Library materials (articles, books, videos, etc.), workshops, and in-service meetings.

Virgin Islands Relay Spanish Communication Assistants must complete the same training as all traditional Communication Assistants plus pass additional test showing proficiency in the Spanish language.

Interpretation of Typewritten ASL

Virgin Islands Relay trains CAs to translate limited written English to correct spoken English via intensive training in three areas. First CAs are trained to gain an understanding of how communication impaired people write English and why. This includes syntax, abbreviations, etc. Virgin Islands Relay then instructs CAs on the proper ways to translate this form of English into correct written English. Finally, Virgin Islands Relay CAs are taught how to translate from limited written English to correct spoken English. By developing skills in these three areas and in this order Communication Assistant are much more capable of translating relay calls. Virgin Islands Relay uses videos, manuals, observation and a variety of role-play scenarios to practice these skills.

At the beginning of the training period, each Communication Assistant receives a manual covering syntax. This manual has proved to be a valuable tool for Communication Assistants as they develop their skills in this area. As a result of this manual and other types of classroom training, Virgin Islands Relay Communication Assistants are able to translate calls from limited written English language into English for the hearing party. Before relaying calls, Virgin Islands Relay CAs must pass a proficiency exam which tests the skills needed to meet this requirement.

In addition to the training described above, the Virgin Islands Relay provider has also developed an intensive translation program. This program was designed by a past President of the Registry of Interpreters for the Deaf and goes into great depth on how to perform translations from limited written English to correct spoken English and vice versa.

Proficiency Examinations

Virgin Islands Relay Communication Assistants begin relaying calls at the end of the three-week training period if all proficiency skills are met including the fundamentals of ASL. Virgin Islands Relay uses several different testing mechanisms to ensure the highest quality standards in the industry. The exams measure skill levels in typing, spelling, dictation, relay procedures, including emergency call handling, characteristics of ASL as it may be reflected in the written language of TTY users, deaf, hard of hearing and speech disabled cultures, ethics and confidentiality, and professional judgement. Part of the exam process is performance based - the Communication Assistant must successfully complete several relay call scenarios. All other sections are quantifiable. Virgin Islands Relay can then determine that a Communication Assistant is meeting and exceeding all minimum FCC proficiency requirements. Tests are not available to CAs prior to testing (all tests are kept under lock and key) and portions of the tests are changed routinely. Any CA who cannot pass this examination within a three-month probationary period will not be utilized as a relay CA. CAs are tested on a variety of topics monthly to ensure that each CA continues to meet all requirements. Virgin Islands Relay retains all documentation of testing.

The performance-based testing used by Virgin Islands Relay consists of several relay tests calls. A variety of call scenarios is given to the CA to complete. Supervisors “grade” the CA on his/her ability to set-up the call, make appropriate billing arrangements, relay the call, typing and

spelling accuracy, and overall proficiency of translating written ASL (when requested) and tone of voice. Various types of relay calls (i.e. VCO & HCO) are also tested.

During performance based testing Communication Assistants must demonstrate a clear understanding of deaf culture, ethics and confidentiality and professional judgement. These calls also test the CAs knowledge of relay procedures, conveyance of non-TTY and TTY user's tone of voice or expressive words.

CA Performance Monitoring to Ensure Each CA Continues to Meet all Requirements

Through its relay provider's advanced relay platform, Virgin Islands Relay has established a unique "remote" call monitoring system. Virgin Islands Relay uses this call monitoring system to perform monthly evaluations. In Appendix E you will find the forms used to evaluate Communication Assistants. Such things as proficiency and professionalism, procedures, language, voice quality, decorum, and professional knowledge and skills are evaluated each month.

Virgin Islands Relay believes quality assurance is of the utmost importance. As a result, Virgin Islands Relay is constantly monitoring its Communication Assistants. Formal call evaluations are completed each month as well as informal "spot checking" every day to insure that Communication Assistants are performing properly on every call.

Monitoring staff are able to remotely monitor Communication Assistants so that the CA does not know when he/she is being monitored. Call monitoring can be performed at any time to ensure that all CAs are delivering high quality service on each call. Feedback is immediately given to each CA upon the completion of call monitoring.

Scores from the call monitoring are calculated and given to the CA so that progress and improvement can be tracked each month. In addition, a "center" report is generated that allows Virgin Islands Relay to monitor overall quality improvements. This system allows Virgin Islands Relay to set quality improvement goals for individuals as well as for the entire center.

Through call monitoring or as a result of poor test scores, any CA not in compliance with quality standards is pulled off the relay floor for further training and re-testing. These CAs are put on probation and monitored frequently to ensure continued improvement.

Quality measurements give Virgin Islands Relay an accurate picture of each Communication Assistant's skills as well as a record from which improvement plans can be built and future progress measured.

(v) CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of ten minutes. CAs answering and placing an STS call must stay with the call for a minimum of fifteen minutes.

Virgin Islands Relay, as a matter of practice, does not change Communication Assistants during a call. Even at the end of shifts, over lunch hours, and other breaks, Virgin Islands Relay CAs

stay with a call until it is completed. Our experience has been that this provides much greater continuity for the user.

Virgin Islands Relay only substitutes a CA if the following should occur:

- **A caller requests a change in gender of the CA**
  Virgin Islands Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call.
- **Verbal abuse or obscenity is directed to the CA**
  If a relay user becomes abusive towards a CA (calling names, etc.) or does not give a number to dial, Virgin Islands Relay's procedure is to send a hot key requesting the number to call three times, waiting approximately 20 to 30 seconds between each time the hot key is sent. If the CA is still being harassed or is not given a number to dial, a supervisor is called. The supervisor will try to process the call. If abuse continues or there is no response, a disconnect slip will be completed.
- **The call requires a specialist (Spanish language, speech to speech, etc.)**
- **A perceived conflict of interest exists**
- **Or another major emergency exists**

A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

If a call does need to be transferred, another CA replaces the CA relaying the call at the same workstation (using the same gender as requested), so that the relay user's call is not interrupted (except to identify the new CA to both parties). A supervisor monitors the change and must approve the change based on the criteria listed above.

Most relay centers have a common practice of substituting agents in the middle of calls to accommodate breaks, quitting times, etc. Virgin Islands Relay does not. Virgin Islands Relay is also willing to pay over-time for this type of service. Virgin Islands Relay exceeds the FCC standard for substitution of Communication Assistants for TTY-based TRS, VRS calls and Speech to Speech TRS.

(vi) TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

Virgin Islands Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call. The identity of each CA is kept confidential.

If a call does need to be transferred, another CA will replace the CA relaying the call at the same workstation (using the gender as requested), so that the relay users' call is not interrupted (except to identify the new CA for both parties). A supervisor monitors and approves the change.

(vii) TRS shall transmit conversations between TTY and voice callers in real time.

Virgin Islands Relay transmits conversations between TTY and voice callers in real time. Virgin Islands Relay provides real time text to voice and voice to text calls in which a deaf, hard of hearing or speech disabled person utilizing a TTY or another form of text telephone can communicate over the existing telecommunications network with a non-TTY user (and vice-versa) through the voice assistance of the relay service (Communication Assistant).

(2) Confidentiality and conversation content.

(i) Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content, and with a limited exception for STS CAs, from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. STS CAs may retain information from a particular call in order to facilitate the completion of consecutive calls, at the request of the user. The caller may request the STS CA to retain such information, or the CA may ask the caller if he wants the CA to repeat the same information during subsequent calls. The CA may retain the information only for as long as it takes to complete the subsequent calls.

(ii) CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the relay user specifically requests summarization, or if the user requests interpretation of an ASL call. An STS CA may facilitate the call of an STS user with a speech disability so long as the CA does not interfere with the independence of the user, the user maintains control of the conversation, and the user does not object. Appropriate measures must be taken by relay providers to ensure that confidentiality of VRS users is maintained.

The Virgin Islands Telecommunications Relay Service Communication Assistants are prohibited from disclosing the content of any relayed conversation, regardless of the content, and from keeping records of the content of any conversation beyond the duration of a call. Communication Assistants are also prohibited from intentionally altering a relayed conversation. Virgin Islands Relay Communication Assistants type everything verbatim unless one of the relay users involved in the conversation requests summarization or translation. At this point in time, the CA gains permission from the other party involved in the call. If both parties agree to translation, the CA will then begin to translate the call. Relay users who always want translation, can select this option on the customer profile.

All Virgin Islands Relay STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. Speech to Speech CAs are given the ability to keep records of the content of any conversation and retain information from a particular call in order to facilitate subsequent calls if requested. Speech to Speech CAs will also repeat any information (without the Speech to Speech user having to say the same thing each time) during subsequent calls if requested to do so. Speech to Speech CAs only retain this information for as long as it takes to complete the subsequent calls.

All Virgin Islands Relay Speech to Speech CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation.

Policies of Confidentiality

Virgin Islands Relay's provider understands the importance and is experienced at relaying conversations promptly and accurately while maintaining the privacy of persons who use telecommunications relay services. All calls handled by the Virgin Islands Telecommunications Relay Service are totally confidential; no written or electronic script or record of any type is kept beyond the duration of the call. Virgin Islands Relay Communication Assistants and supervisory personnel understand that they shall not reveal information about any call, at anytime, regardless of content except the minimum necessary for billing purposes. All relay personnel are required to sign a Pledge of Confidentiality promising not to disclose the identity of any callers or fellow Communication Assistants or any information learned during the course of relaying calls during their period of employment as a Communication Assistant or after termination of employment. When relaying calls or analyzing data, Hamilton follows all confidentiality practices listed here.

Following is a general outline of some of the policies Virgin Islands Relay uses to preserve confidentiality:

1. All Communication Assistants are given thorough training on the significance and importance of maintaining confidentiality from both a legal perspective and a moral perspective.

2. Before being allowed in the relay service center and before taking any live calls, Communication Assistants are required to sign a Pledge of Confidentiality. (See Pledge of Confidentiality further in this section).

3. All Communication Assistants, prior to taking any live calls or being allowed in the relay center, are given a copy of Virgin Islands Relay's policies of confidentiality in addition to a copy of their signed Pledge of Confidentiality.

4. Virgin Islands Relay's policy requires immediate termination for any violation of confidentiality.

Virgin Islands Relay has additional protocols in place to prevent an unintentional disclosure of relayed conversations. The Communication Assistants' Procedure Handbook includes rules and regulations which must be followed to prevent any unintentional disclosure of confidential information. A whole section of this handbook is dedicated to the importance of confidentiality. From day one of the training program, Communication Assistants are taught how to work in a "confidential" environment.

The actual physical facility, in which the Communication Assistants perform their specialized duties, is located in a physically separated, private room, at the offices of Hamilton at 1006 12th

Street, Aurora, Nebraska, 68818. The room is clearly marked prohibiting any unauthorized access.

Confidentiality During Training
When training new Communication Assistants by sharing past experiences, trainers do not reveal any of the following information:
(1) Names, genders, or ages of the parties involved in the call
(2) Originating or terminating points of the call
(3) Specifics of the information conveyed

Discussion of Calls

Virgin Islands Relay Communication Assistants understand that they shall not discuss, even amongst themselves or their supervisors, any names or specifics of any relay call except in instances of resolving complaints. Virgin Islands Relay Communication Assistants also understand that they may discuss the general situation surrounding a call with their supervisor in order to clarify how to handle a particular type of relay call and for that limited purpose only. Communication Assistants are trained to ask questions about procedures without revealing names or specific information that will identify callers. They are also trained to recognize emergency or life threatening situations and understand those circumstances in which the Communication Assistant may disclose names and specific information in order to expeditiously address the situation.

Watching or Listening of Actual Calls

No one is allowed to watch or listen to actual calls other than the Communication Assistant.

PLEDGE OF CONFIDENTIALITY

I, the undersigned Relay Service Communication Assistant for the Relay Center, do hereby recognize the serious and confidential nature of this position and therefore promise in all good faith and conscience to abide by the following guidelines:

1) Under no circumstances will I disclose to an individual the identity of any caller or information I may learn about a caller while relaying his/her messages.

2) Under no circumstances will I act upon any information I may learn while relaying a call.

3) Under no circumstances will I disclose to anyone the names, schedules or personal information of any fellow Relay Service Communication Assistant or supervisor working at the Relay Center.

4) I will not share any information about a caller with any person with the exception of relay center supervisory personnel and then only to the extent necessary to resolve complaints, collect or clarify personal information necessary to provide and bill for relay services, such general information as may be necessary for the supervisor to assist in clarifying how to process a particular type of relay call, and such specific information as may be necessary for a supervisor to assist in expeditiously addressing an emergency situation.

5) In the event of my resignation or termination of my employment, I will continue to hold in strictest confidence all information related to the work I have performed as a Relay Service Communication Assistant.

Name (sign) _____

Name (print) _____

Date _____

Violation of Confidentiality

Virgin Islands Relay's policy requires immediate termination for any violation of confidentiality.

Any of Virgin Islands Relay's Communication Assistants or supervisors who, after an investigation have been found to violate the confidentiality rules and regulations will be terminated immediately. If a consumer would allege a violation of confidentiality and the same was reported to the relay center or to Innovative Telephone in any manner, Virgin Islands Relay's policy would be to first investigate the alleged violation internally and make a written report both for the complaint file of the relay service as well as for the personnel file of the individual or individuals alleged to be involved. If a violation was found to have occurred those parties responsible for the violation would be terminated immediately.

(3) Types of calls.

(i) Consistent with the obligations of telecommunications carrier operators, CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services.

(ii) Relay services shall be capable of handling any type of call normally provided by telecommunications carriers unless the Commission determines that it is not technologically feasible to do so. Relay service providers have the burden of proving the infeasibility of handling any type of call.

(iii) Relay service providers are permitted to decline to complete a call because credit authorization is denied.

Virgin Islands Relay does not and will not place any restrictions on the length or number of single or sequential calls placed by customers through the relay center. Virgin Islands Relay has never requested that a relay user finish early. Virgin Islands Relay will continue to manage its traffic loads in a manner which will not require it to ask customers to call back later under any circumstances.

Virgin Islands Relay is capable of processing non-coin-sent paid calls, sent-paid calls, collect calls, person-to-person calls, international calls, hotel calls and calls charged to a third party. Virgin Islands Relay also is able to process credit cards, any Virgin Islands local exchange calling cards and all non-proprietary interexchange company calling cards that are accessed by dialing an 800 number. This includes all major interexchange company calling cards. Relay users simply inform Virgin Islands Relay CAs when they want to use an alternate form of billing. The CA selects the correct billing method from an on-screen menu and the call is then placed. The customer's carrier of choice bills the call (based on conversation time) for intraLATA, InterLATA, and international calls.

Coin Sent Paid

Virgin Islands Relay is capable of handling any call normally provided by common carriers with the exception of coin sent paid calls. Coin sent paid calls cannot be processed through the relay

due to a lack of existing technology. The technology and networks between the common carrier network, payphones, and relay do not allow for signaling to be passed so that a Communication Assistant can determine when coins have been dropped into the payphone. The FCC ordered that coin sent paid calls are not feasible.

Virgin Islands Relay does not charge relay users who want to place a local call from a payphone as stated in the current FCC coin-sent paid order.

Relay users making a long distance call from a payphone are able to use a calling card (debit card, regular calling card, etc.) or place a collect or third party call. The customer's carrier of choice then rates and bill any long distance payphone calls. Once billing has been established the call is processed as a regular relay call. In this manner, all relay users have access to anyone from a payphone.

Cellular/Wireless/PCS Phone Access

Virgin Islands Relay is capable of processing relay calls that involve pagers, cellular and personal communications services. These services are all part of the Public Switched Network and they are handled just like any other relay call. The relay switch is compatible with the Public Switched Network. There is no difference in how voice or text initiated calls through relay are processed over wireless devices.

Virgin Islands Relay treats wireless call types just the same as any other call type and processes the call identically ensuring accurate billing by the wireless provider. Virgin Islands Relay has DTMF boxes at each workstation to perform dialing or access functions for relay users. DTMF boxes send tones that activate automated voice systems and pagers. Relay users can use wireless devices to call through relay including pagers. With DTMF capability, Virgin Islands Relay can navigate voice menus, answering machines, or any other automated system that either record or passes on voice, text, or electronic message to the other party even when using a wireless device.

The only time Virgin Islands Relay has experienced difficulty with wireless services is when a call originates from a non-feature group D office (that does not forward the correct ANI information). Although the majority of the time, this is not an issue, there are occasions when a wireless switch sends false ANI information on wireless calls and the CA needs to ask for an alternate form of billing.

For calls originating in areas where false ANI information is forwarded, Virgin Islands Relay's provider has developed an interim solution. The relay switch identifies wireless calls. When a wireless call has a false ANI associated with it, Virgin Islands Relay processes the call as "no bill" preventing the relay user from having to use alternate form of billing**.**

Directory Assistance

Virgin Islands Relay gives all relay users access to local, intrastate and interstate directory assistance services via the relay and processes directory assistance requests in the same manner as any other relay requests.

Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies the relay and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

- **End User Billing for Directory Assistance**
  The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice bills for InterLATA and intraLATA directory assistance calls at their tariffed rate. With intraLATA presubscription, all billing is performed by the customer's carrier. All directory assistance calls are sent to the customers' carrier of choice for processing and billing. Virgin Islands Relay does not set any rates for long distance or operator assisted calls since the customer's carrier of choice bills these calls. All directory assistance calls are billed via the customers long distance carrier.

Virgin Islands Relay will continue to meet and adhere to all FCC requirements for all types of calls.

Network Access

Virgin Islands Relay provides functionally-equivalent network access for its users. This includes access to local, intrastate, interstate, and international call types.

Virgin Islands Relay's system provides for and serves all of the following types of calls. All trunks today are provisioned to be accessible from any jurisdiction.

(1) Local calls originating and terminating within the Virgin Islands
(2) IntraLATA calls originating and terminating within the Virgin Islands
(3) Interstate calls that originate within the Virgin Islands and terminate outside of the Virgin Islands - Billed to the TRS Interstate Fund (NECA)
(4) Interstate calls that originate outside of the Virgin Islands and terminate in the Virgin Islands - Billed to the TRS Interstate Fund (NECA)
(5) Interstate calls that originate outside of the Virgin Islands and terminate outside of the Virgin Islands - Billed to the TRS Interstate Fund (NECA)

Virgin Islands Relay 800 numbers, including 711, are able to place call types 1-7. Virgin Islands Relay's service is designed so that all calls made through its relay centers are billed from the originating telephone number to the terminating telephone number as if the call were made directly with no relay intervention. The relay platform includes necessary information about extended area service and optional calling plan arrangements in the Virgin Islands so that calls made within an EAS area or optional calling area are not billed to the customer. Automatic Number Information (ANI) appears at the workstation automatically and the terminating number is keyed in by the Communication Assistant so that a billing record can be created. For calls originating in areas where ANI is not forwarded, Virgin Islands Relay Communication Assistants will key in originating number information.

Virgin Islands Relay does not charge its users for use of the relay service. Users access the relay service via toll-free 800 numbers, which are accessible anywhere in the United States or by dialing 711. Calling and called parties bear no charges for calls originating and terminating within the same toll-free local calling area, including all Extended Area Service (EAS) locations and/or local optional calling plan data.

Local and Intrastate Relay Calling

Virgin Islands Relay provides local and intrastate calling to its users and has obtained the necessary information (NPA/NXX) to build a database to identify the difference between local and intrastate calls (including expanded local information).

Virgin Islands Relay has updated its database within its switching platform and its toll processing system to identify certain NPA-NXXs as toll-free calling areas. Relay users with access to optional calling plans are not billed any more for calls to the specific optional calling area than if they would have called directly through their local network.

The calling party's ANI is compared to the called number. The relay database used by Virgin Islands Relay determines if it is a local or intrastate toll call and gives the Communication Assistant notification if billing information is required. If it is a local or intrastate call, no billing arrangements are necessary and there are no charges.

The entire call process and CA procedures used by Virgin Islands Relay are designed to make the relay center seem invisible. To the relay user, a call looks like it was placed from his or her primary location to the call destination. Relay users do not see or get billed for the "links" going to and from the relay center. Relay users receive no billing for local or intrastate calls.

Access to Regionally Directed Toll-Free Numbers

Virgin Islands Relay allows access to regionally directed toll-free numbers. Because Virgin Islands Relay passes true Caller ID information, the caller's ANI reflect a Virgin Islands number which results in the call being routed to the correct location.

Access to Restricted Toll Free Numbers

The service provided by Virgin Islands Relay allows access to restricted 800 numbers and other special prefixes. Virgin Islands Relay is providing this service today through an incumbent LEC via re-originating dial tone. Virgin Islands Relay makes sure that all of the relay users in the Virgin Islands have access to all 800 numbers and other special prefixes.

Access to Businesses with Special Prefixes

Virgin Islands Relay understands that some local telephone companies have abbreviated numbers available for services calls. Virgin Islands Relay will continue to work with Local

Exchange Carriers to ensure proper routing and will allow Virgin Islands relay users to access businesses with special prefixes.

Relaying Interstate and International Long Distance Calls

Virgin Islands Relay provides interstate and international calling to Virgin Islands relay users. As stated in the previous section, Virgin Islands Relay does not bill any long distance calls and thus is not in control of other carrier's discounts for relay calls. Virgin Islands Relay does provide to relay users a list of carriers available through the relay with customer service numbers so that a relay user can call any long distance company of their choosing to gather rate information, sign up for a relay discount, etc.

Following in this section is a complete description of how users are billed for long distance relay calls.

Inbound International Calls

Virgin Islands Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Virgin Islands Relay then places the outbound call to a destination in the United States free of charge and relays the conversation for them. All processed International calls are billed to the Interstate TRS Fund Administrator.

End User Billing for all Toll Calls

InterLATA (including interstate and international) long distance toll charges are recorded and billed by the relay users' carrier of choice in the same manner as the carrier bills that customer for direct interstate long distance calls. On each InterLATA call, Virgin Islands Relay forwards the appropriate information digits, calling number and called number call as part of the call information so that the long distance company can bill the customer directly or through their normal billing mechanisms.

Virgin Islands Relay forwards information on each toll call to the relay user's carrier at the time the relay call actually takes place. The record contains: the originating and terminating numbers and the call type (e.g., person-to person, collect). InterLATA billing records are created by the interexchange carrier as a result of the information digits and calling and called number data being sent to the interexchange carrier at the time the call is made. Long distance charges are based on the originating and terminating numbers. The location of the relay center does not affect billing. The long distance carrier bills based on conversation time using their own rounding calculations. Virgin Islands Relay does not pass on session time to the carrier so only conversation time is billed by the carrier. Billing and collection is then the responsibility of the interexchange carrier who carries the call.

The format of the bill for all toll calls are determined by the carrier as Virgin Islands Relay does not bill any relay calls. However, the call digit information will identify the call as a Virgin Islands TRS call and will further designate the type of call (i.e. 3rd number call, direct dial call,

collect call, and person-to-person call). This allows carriers to correctly identify each relay call on their bill.

All billing to the relay user is based on minutes of conversation and is processed by the relay user's carrier of choice.

Virgin Islands Relay has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

Automated Billing System to Determine Call Jurisdiction

Virgin Islands Relay makes use of an automated billing system to determine call jurisdiction. Virgin Islands Relay marks on every billing record whether the call is local, EAS, intrastate or interstate. This is done immediately when the call is placed. Virgin Islands Relay performs a second check of call jurisdiction during the monthly settlement process. In addition to redundant jurisdiction look-ups, Virgin Islands Relay also accounts for every minute of relay use. This means that all reports must balance at the end of every month in each jurisdiction category. This additional safeguard ensures that all minutes are accounted for correctly. Virgin Islands Relay bills the Interstate TRS Fund Administrator for all interstate minutes.

(iv) Relay services shall be capable of handling pay-per-call calls.

Pay-Per-Call Services

Virgin Islands Relay allows relay users to access
800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly. Virgin Islands Relay has established the necessary trunking to the carriers participating in relay equal access so that the carrier can bill directly for this call.

A relay user simply calls the TTY relay number and gives the 800, 900 or 976 number to the CA. The CA places the call as usual and begins relaying the call. On all 900 or 976 numbers, Virgin Islands Relay CAs type the dollar amount per minute associated with the call to the TTY user and asks him/her if he/she want to continue the call before charges begin. This is the point in which callers can disconnect without being charged. The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate. The Virgin Islands Relay provider bills the Interstate TRS Fund and Innovative Telephone using the percentage split defined by the Interstate TRS Fund Administrator for 800, 900, and 976 calls.

Customers who do not want 976/900 calls made from their telephone line through the relay, can complete a customer profile form. The customer profile contains an option that will block 900 and 976 calls made through the relay. This prevents anyone from calling a 900 or 976 from that particular telephone line. If someone tries to call a 900 or 976 number through the relay from a

line that has a block on it, the CA will receive notification at the workstation that this call is blocked and will not be able to place the call.

(v) TRS providers are required to provide the following types of TRS calls: (1) Text-to-voice and voice-to-text; (2) VCO, two-line VCO, VCO-to-TTY, and VCO-to-VCO; (3) HCO, two-line HCO, HCO-to-TTY, HCO-to-HCO.

TTY/ASCII to Voice

Virgin Islands Relay is able to accept a call from a TTY equipped caller, place a call to a hearing and voice capable caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Virgin Islands Relay processes its TTY/ASCII relay calls.

Once the call is connected, the Communication Assistant sends a macro: "VIR CA# ____ M/F number to call pls Q GA." The Communication Assistant dials the number requested and informs the TTY user of the status of the call via the keyboard (dialing, ringing, line busy, party not available, party available, explaining relay, etc.) If the called party has not received a relay call before and the TTY user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The TTY user then types the initial message, and the Communication Assistant verbally repeats this to the called party.

Voice to Text Call Processing

Virgin Islands Relay is able to accept a call from a hearing and voice capable caller, place a call to TTY equipped caller and translate the voice messages to TTY messages and TTY messages to voice messages in order to complete the communications link. Following is an explanation of how Virgin Islands Relay processes its Voice relay calls.

Virgin Islands Relay's Communication Assistant answers: "Virgin Islands Relay CA #_____. Number to call please." The Communication Assistant extends the call to the called number and informs the voice caller of the status of the call (dialing, ringing, line busy, party not available, party available, explaining relay, etc.). If the called party has not received a relay call before and the voice user has not requested otherwise, the Communication Assistant explains what relay is and how it works before beginning to relay the call. The voice caller then begins the initial message that the Communication Assistant types to the called party.

Voice Carryover (VCO)

Voice Carryover (VCO) provides relay users with the ability to call to or receive a call from a voice-capable caller who is hearing-disabled permitting the caller to speak his or her own message directly to a call recipient who is hearing-capable without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Virgin Islands Relay allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say

"VCO" and Virgin Islands Relay connects the call. Voice users do not hear tones during a VCO call.

Virgin Islands Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of VCO call types are also available through Virgin Islands Relay.

The following is a comprehensive description of the method used to achieve this type of service.

A voice person receiving a call from a VCO user will experience the following:

"This is Virgin Islands Relay CA # _____ with a call from someone who may be deaf or hard of hearing and uses Voice Carry Over. Have you received a relay call before?"

At the same time, the CA will type to the VCO user the terminator's greeting and gender (i.e. HELLO (M).

If the voice party answers "Yes," The CA will VOICE: "Have you received a Voice Carry Over call before?"

If the party answers "Yes," The CA will VOICE: "One moment for your conversation to begin."

If the party answers "No," the CA will send a macro (EXPLAINING RELAY) to the VCO user and will voice: "The person calling you through the relay uses Voice Carry Over. You will hear the person speaking directly to you. When the caller says, "Go Ahead", it is your turn to talk. Then I will simply type everything I hear on your end of the line, so please talk slowly and directly to your caller. Please say "Go Ahead" when you are finished speaking. One moment and you will hear your caller's voice."

Two-Line VCO

Virgin Islands Relay provides two-line VCO capability which allows a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to their conversation if they have some hearing available, on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Announcement:
No announcement unless specifically requested.

Explanation:
When voice party answers, the CA will type their greeting and gender to the 2LVCO user i.e. HELLO (M)

The CA will continue typing everything voice party says during the conversation. The CA does not use "GA" or wait for "GA" during the conversation. The CA types only what the Voice user says and DOES NOT type what the 2LVCO user says. May summarize if necessary.

Reverse Two-line VCO

Virgin Islands Relay's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

VCO-TTY and TTY-VCO

Virgin Islands Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

Announcement to TTY Terminator:
The CA will type: VIR CA# ____ with a call from vco user (gender) ga

CONVERSATION BEGINS

The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

Explanation to TTY Terminator:
I will type your caller's conversation to you. You will type directly to them.

In addition, Virgin Islands Relay will provide VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

VCO-VCO

This service allows two VCO users to contact each other through the relay. Virgin Islands Relay provides VCO to VCO service where the CA types to both parties, preventing the VCO users from having to type their part of the conversation.

Announcement:
The CA will type: "VIR CA# ____ with a call from vco user (gender) ga"

When the terminator requests VCO, the CA will connect VCO and type: "VCO on ga"

CONVERSATION BEGINS

The CA will then type all conversation from the terminator to the originator and vice versa.

Explanation:
"The person calling you is also using Voice Carry Over. I will type your voiced responses to each other."

Hearing Carryover (HCO)

This feature allows relay users to place calls to or receive calls from a hearing-capable caller who is speech disabled permitting the caller to hear the communication directly from the call recipient without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Virgin Islands Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. As discussed in detail further in this Tab, a variety of HCO call types are also available through Virgin Islands relay.

A voice person receiving a call from an HCO user will experience the following:

"This is Virgin Islands Relay CA # _____ with a call from someone who may be speech disabled and uses Hearing Carry Over. Have you received a relay call before?

If the party answers "Yes," The CA will VOICE: "Have you received a Hearing Carry Over call before?"

If the party answers, "Yes," The CA will VOICE: "One moment for your conversation to begin."

If the party answers "No," The CA will VOICE: "The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller's typed response to you. When I say, "Go Ahead", it is your turn to talk. Please talk directly to your caller and say, "Go Ahead", when you are finished speaking. One moment for your conversation to begin."

Two-Line HCO

Virgin Islands Relay provides two-line HCO capability. To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

The CA will identify the call to the voice terminator using the language described in the previous section. If the voice party is not familiar, the CA will use the following explanation:

"The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller's typed response to you. Please talk directly to your caller."

HCO-TTY and TTY-HCO

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

Announcement:
The CA will type: "VIR CA# ____ with a call from hco user (gender) ga"

CONVERSATION BEGINS

The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

Explanation:
"I will voice what you type to them. They will type directly to your TTY."

HCO-HCO

This service allows two HCO users to contact each other through the relay. Virgin Islands Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation. This is a great relay enhancement and Virgin Islands Relay is pleased to offer it to relay users.

Announcement:
The CA will type: VIR CA# ____ with a call from hco user (gender) ga

When the terminator requests HCO, the CA will connect HCO and voice: "HCO on ga"

CONVERSATION BEGINS

The CA will then voice all conversation from the terminator to the originator and vice versa.

Explanation:
"The person calling you is also using Hearing Carry Over. You will hear me as I read your typed responses to each other."

(vi) TRS providers are required to provide the following features:

(1) Call release functionality; (2) speed dialing functionality; and (3) three-way calling functionality.

TTY to TTY Call Release

Virgin Islands Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first, or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Virgin Islands Relay gives the calling party the option to communicate independent of the relay function. The CA types to the terminating TTY user, "TTY TO TTY CALL ONE MOMENT PLS."

The CA then types to the originating party, "(CA HERE YOU ARE CONNECTED TTY TO TTY WHEN YOUR CALL IS FINISHED CALL BACK TO RELAY TO MAKE A RELAY CALL OR JUST HANG UP ONE MOMENT PLS)."

Once the CA sees the two TTY parties are able to read each other, the CA types, (CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW) GA.

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Virgin Islands Relay provides a true call release function to satisfy the FCC requirement, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice).

Voice to Voice Call Release

Virgin Islands Relay provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This happening is usually inadvertent. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

Once the CA hears the two hearing parties are able to communicate with each other, the CA states, "CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW".

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take any other incoming calls.

Using the above procedure, Virgin Islands Relay provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice). Once the call has been released from the workstation, the call ceases to be a TRS call and is not subject to the per-minute charge to the State.

Speed dialing

Virgin Islands Relay has developed a customer profile for relay users to indicate calling preferences. Customer profile information is presented to the CA each time the relay user calls the relay and includes the option of Speed Dialing. In the Speed Dialing section of the Customer Profile form, customers list the first name and phone number of people they call often through the relay. When a customer wants to call that person, they simply instruct the CA to call that person. There is no need to give the number to the CA.

Three-way calling

In compliance with the FCC Order released on June 17, 2003, Virgin Islands Relay provides three-way calling capability, in which the customer (if the customer has purchased this feature from his/her LEC) can use this feature to either tie the third party directly into the conversation or to tie the third party in by making a second call to the relay center.

(vii) Voice mail and interactive menus. CAs must alert the TRS user to the presence of a recorded message and interactive menu through a hot key on the CA's terminal. The hot key will send text from the CA to the consumer's TTY indicating that a recording or interactive menu has been encountered. Relay providers shall electronically capture recorded messages and retain them for the length of the call. Relay providers may not impose any charges for additional calls, which must be made by the relay user in order to complete calls involving recorded or interactive messages.

Machine Recording Capabilities

Virgin Islands Relay has a recording function that allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of a hot key on the CA's terminal that a recording has been reached, followed by another hot key stating (CA HERE WOULD YOU LIKE COMPLETE MSG TYPED OR HOLD FOR A DEPT OR LIVE PERSON Q).

If a caller requests a department or live person, the CA types, "HLDING FOR DEPT/PERSON" and presses the appropriate option when the recording prompts.

If a caller requests listening to the complete message, the CA sends a hot key that states, "COLLECTING INFO PLS HLD" and the CA continues to collect the recording.

The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording ensuring the message is transmitted accurately by the CA. This makes the recording function very easy for Communication Assistants to use.

Whenever Virgin Islands Relay has to redial to an answering machine, voice mail, interactive voice messaging unit, or any other type of recording system, for whatever reason, Virgin Islands Relay does so without billing the customer for any subsequent long distance relay calls.

Answering Machine Procedures

Communication Assistants are trained to relay recorded messages and leave recorded messages on telephone answering machines or hang up at the request of the caller.

Answering Machine procedures are as follows:

- Communication Assistant informs the relay calling party that an answering machine has been reached.

- The relay user can tell the Communication Assistant to simply leave a message if they do not want the Communication Assistant to type the entire recording. Otherwise, the Communication Assistant types the entire answering machine message. The Communication Assistant records messages and convey the message in its entirety.

- The CA asks the caller if they want to leave a message.

- If the calling party would like to leave a message, the Communication Assistant either voices or types the message onto the answering machine.

- Communication Assistant notifies the calling party that the message has been left.

- The relay customer is only be charged for the first call to the answering machine, if a toll call, regardless of the number of calls that may be required to retrieve and convey the answering machine message and/or to leave a message.

If the relay user gives the CA directions of how they want the call handled, the CA follows the user's directions. The customer's directions always override established procedures.

(viii) TRS providers shall provide, as TRS features, answering machine and voice mail retrieval.

Answering Machine and Voice Mail Retrieval

Communication Assistants are trained in retrieving and relaying TTY messages to voice users and voice messages to TTY users from voice processing systems. Communication Assistants use the following procedures to obtain messages for relay users:

1. The user is informed that the Communication Assistant has reached a voice processing system.

2. If the user requests message retrieval, Virgin Islands Relay obtains the appropriate access codes from the user. Virgin Islands Relay does not retain access codes or any other information

needed to access a voice mail system subsequent to the call. This information is considered "call" information and just like any other call information, is kept totally confidential.

3. After the voice processing system has been accessed, Virgin Islands Relay Communication Assistants begin to relay any messages that have been recorded or leave a message as requested. Virgin Islands Relay makes use of its advanced recording function to capture this information as discussed previously.

4. If the Communication Assistants must call again to finish relaying any messages, Virgin Islands Relay Communication Assistants do so without billing the end user for subsequent calls.

Virgin Islands Relay alerts relay users to the presence of a recorded message and/or interactive menu. Virgin Islands Relay uses hot keys (automated macros) to announce recordings or interactive messages. Virgin Islands Relay does not charge a relay user for subsequent calls to a recording or interactive messages.

Answering Machine Retrieval (Single-Line)

Virgin Islands Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistants by putting the handset near the speaker of the answering machine. The technology used by Virgin Islands Relay records any messages, enabling the Communication Assistants to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

(4) Handling of emergency calls. Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

The Procedure used by Virgin Islands Relay for Handling Emergency Calls

Virgin Islands Relay makes use of a national Emergency Call Relay Center, operated by Intrado, Inc., for the provision of handling emergency relay calls.

Virgin Islands Relay has had great success with Intrado and follows the procedures below:

- If the caller has the local emergency number which needs to be accessed, the call is promptly placed and handled in the same manner as any other relay call.

- In the event that the caller does not have the access number to 911 and the emergency appears to be of such a nature that time will not permit the caller to hang up and call directly

to 911, the CA will contact the Emergency Call Relay Center (ECRC) which is accomplished through one stroke on the keyboard.

- Simultaneously, the CA obtains the address from which the person is calling from and selects the “emergency call” box option on the software at the workstation. (A Supervisor assists every 911 call. When a Communication Assistant makes this selection, a Supervisor is notified immediately as a flag indicator on the Supervisor Console is activated.)

- Once connected to the ECRC, the CA will identify as a TTY relay call and relay the location of the caller. (If the CA does not obtain location information, the CA gives the ECRC the ANI of the caller.)

- The ECRC immediately transfers the call to the appropriate Public Service Answering Point (PSAP) center. The ECRC drops off the call once confirming that both parties are on the line and the correct PSAP has been reached. The CA processes the call as normal.

- Virgin Islands Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

Back-up Emergency Procedures

- As a back-up to Intrado in the event that Intrado is unable to match the caller with the appropriate PSAP, Virgin Islands Relay has procedures in place to access its own emergency database.

- The software used by Virgin Islands Relay takes the NPA/NXX information from the ANI of an incoming call and matches it to information in its database. The ANI indicates what city or location a call is coming from. This NPA/NXX information is then cross-referenced to a list of towns and locations in the Virgin Islands stored in the database. Virgin Islands Relay has mapped each NPA/NXX in Virgin Islands to the appropriate PSAP. Once this search is complete (it only takes a second) the correct emergency telephone number is loaded automatically into the "outdial" box and the Communication Assistant can immediately dial the appropriate emergency personnel. This process ensures that Virgin Islands Relay users have access to the correct and appropriate PSAP when their call is handled in any Hamilton facility.

- Virgin Islands Relay passes the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services.

- If the caller is using a cellular phone, the ANI is not a good indication of where the caller is actually calling from. In this case, the CA asks for the nearest city name and initiates an automated search for the appropriate PSAP. If several PSAPs are listed for the same city, the CA will try to identify the correct one with a quick question to the caller.

- Virgin Islands Relay’s emergency database application described above meets the new requirements established by the FCC.

FCC Rules for Emergency Calls

In the June 2004 order, the FCC adopted the definition of "appropriate" PSAP as "either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner." The database used by Virgin Islands Relay automatically and immediately transfers the caller to the appropriate Public Safety Answering Point based on NPA/NXX information.

The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point numbers (i.e. 911 centers). Virgin Islands Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Virgin Islands Relay's provider.

TTY to TTY Communications Between PSAP and Caller

Virgin Islands Relay will process direct TTY to TTY communications between the PSAP and the TTY caller.

If a Caller Disconnects Before Being Connected to the PSAP

In the event that a caller disconnects before being connected to the PSAP even if the CA is unable to get the number of the caller before the call is disconnected, the workstation contains a notification feature that initiates a command to write a record of the ANI calling for emergency assistance. The Supervisor can then access this information if needed, so no matter when the caller hangs up, Virgin Islands Relay can send the correct ANI information to the 911 center.

The Supervisor will contact the appropriate 911 center and give the dispatcher any pertinent information collected on the call. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from.

Virgin Islands Relay is not intending to be a 911 center; however, as stated above we will not turn away an emergency situation and Virgin Islands Relay will take all reasonable steps possible to get the call placed and summon any necessary help. During the course of any such calls, the CA continually attempts to solicit as much information as possible about the nature of the emergency so that in the event that the caller cannot complete the call for any reason, the CA may have an opportunity to seek out the appropriate emergency assistance. The CA then gives the dispatcher any pertinent information collected on the call even if the originator of the call has disconnected. This includes ANI for the caller so that if the 911 center has "Enhanced 911 Services", emergency personnel will be able to locate where the person in need is calling from. This meets the FCC's new requirement where a CA must pass along the caller's telephone number to the PSAP when a caller disconnects before being connected to emergency services. This allows the PSAP to follow their regular procedures, which is to call back the person calling for help. If time allows, the CA will let the relay user give this information to the dispatcher through normal call practices.

The emergency call plan used by Virgin Islands Relay follows this section. This covers the scenario of a relay user disconnecting before the call is completed. If the 911 call is completed, the CA will follow normal relay procedures with the assistance of a supervisor and the caller's ANI is transferred to the appropriate PSAP as described above.

911 Procedures

If the caller disconnects before the emergency call to the PSAP is completed:

Call the 911 Dispatch number that is listed in the Emergencyfile.txt or the emergency dispatch numbers file ASAP (all of this is immediately available on the CA's workstation screen). Remember this is a 911 call.

When you reach the 911 dispatch operator use the following steps:

A. **Greeting**: This is "CA XXXX" from "State" Relay Center. We just received a 911 call that wasn't completed. The caller uses a TTY and may be Hard of Hearing, Speech Disabled, or Deaf. The ANI is XXX-XXX-XXXX.
B. Ask the 911 dispatch operator if they have a TTY. If they do not proceed to item "C". Ask if they know how to use the TTY. If they don't know how to use the TTY proceed to item "C". If they know how to use the TTY proceed to item "E".
C. Give the 911 dispatch operator the Voice relay number for the correct state.
    1. LA 800-947-5277
    2. WI 800-947-6644
    3. KY 800-648-6057
    4. NE 800-833-0920
    5. ID 800-377-1363
    6. RI 800-745-6575
    7. ME 800-457-1220
    8. WY: 800-877-9975
    9. IA: 800-735-2943
    10. MT: 866-253-4090
    11. GA: 800-255-0135
    12. WV 800-982-8772
    13. AZ 800-842-4681
    14. KS 800-766-3777
    15. MD 800-201-7165
    16. Saipan: 866-339-9384
    17. Virgin Islands: 800-809-8477
D. Ask the 911 dispatch operator if they know how to use the relay. If yes proceed to item "E".
    1. Relay Explanation
       The person you are calling through relay will be typing their conversation and the CA will read it to you.

E. Ask the 911 dispatch operator for their name or operator number. Record this information on the CA's Emergency Call Slip.

Complete the Supervisor Emergency Call Slip in the Emergency Dispatch Numbers folder.

Virgin Islands Relay currently handles emergency calls as expeditiously and effectively as possible even though the center is not designed to be a substitute for 911 centers.

(5) STS called numbers. Relay providers must offer STS users the option to maintain at the relay center a list of names and telephone numbers which the STS user calls. When the STS user requests one of these names, the CA must repeat the name and state the telephone number to the STS user. This information must be transferred to any new STS provider.

Speech to Speech

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. STS users are able to communicate with any and all relay users including but not limited to VCO, HCO, TTY, 2LVCO, other STS users or standard phone users. Specially trained CAs process Speech to Speech calls. STS is also available in Spanish.

Virgin Islands Relay's provision of Speech to Speech meets all FCC requirements for Speech to Speech call processing.

Prior to all outgoing calls, STS CAs verify the number for accuracy and then repeat the number when dialing out. This verification process is repeated for all busy numbers after dialing out and receiving a busy signal.

STS CAs are permitted to facilitate a call for a user with a speech disability if the user does not oppose the intervention as required by the FCC. STS CAs do not interfere with the independence of the user; the user maintains complete control of the conversation. The STS CA may retain information only for subsequent calls.

Virgin Islands Relay provides STS users the same profile and all of the features contained within that profile which are currently available to other relay users. Virgin Islands Relay has a feature, which allows all relay users, including STS users, to maintain a list of names and telephone numbers. A relay user simply gives the name of the person to call to the CA, the CA repeats the name and state the number of the person to call. The Speed Dial feature is of great benefit to STS users.

Virgin Islands Relay complies with the 15-minute requirement prior to changing STS CAs. STS CAs understand the difficulties involved in changing CAs and only request a relief under emergency circumstances. A Supervisor must approve and facilitate a STS CA change. Virgin Islands Relay STS CAs truly care about STS consumers and are willing to stay with a call until completion even at the end of a shift, at lunch time or break time. Virgin Islands Relay exceeds the FCC standard for substitution of STS CAs.

If a change in STS CA is necessary, another CA will replace the CA relaying the call at the same workstation so that the relay user's call is not interrupted except to identify the new CA to both parties. The replacement STS CA will announce, "This is CA# ____continuing your call." A supervisor monitors the change and must approve the change based on the caller's request or emergency circumstances.

All STS CAs have the authority, at the request of the STS user, to retain information beyond the duration of a call in order to facilitate the completion of consecutive calls. This information is retained only for the duration of the inbound call. STS CAs retain any important information given by the STS user which might be difficult for the STS relay user to repeat (i.e. credit card numbers, telephone numbers, account numbers, etc.) for use in a subsequent outbound call. Virgin Islands Relay places a great emphasis on maintaining the confidentiality of relay users. As a result, all information is destroyed immediately upon termination of the inbound call. The above meets all FCC requirements for Speech to Speech call processing.

With a staff of highly trained STS CAs, Virgin Islands Relay provides the best service possible to an emerging group of relay users.

TAB 4

Technical Standards

(b) Technical standards.

(1) ASCII and Baudot. TRS shall be capable of communicating with ASCII and Baudot format, at any speed generally in use.

The Virgin Islands Relay is capable of receiving and transmitting using Voice, Turbo Code, ASCII or Baudot formats, at any speed generally in use. All equipment is compatible with industry-wide standards. The modems used by Virgin Islands Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. Virgin Islands Relay furnishes all necessary telecommunications equipment and software to be capable of communicating with all voice, Baudot and ASCII calls at the correct Baud rate. The workstations and switching mechanisms used by Virgin Islands Relay are flexible enough to process other formats as they become available to relay users.

The Virgin Islands Telecommunications Relay Service provides Turbo Code, a proprietary alternate protocol developed by Ultratec which allows faster typing speeds and interrupt capability. This alternative protocol is discussed in detail in Appendix A.

(2) Speed of answer.

(i) TRS providers shall ensure adequate TRS facility staffing to provide callers with efficient access under projected calling volumes, so that the probability of a busy response due to CA unavailability shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(ii) TRS facilities shall, except during network failure, answer 85% of all calls within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold. The ten seconds begins at the time the call is delivered to the TRS facility's network. A TRS facility shall ensure that adequate network facilities shall be used in conjunction with TRS so that under projected calling volume the probability of a busy response due to loop trunk congestion shall be functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

(A) The call is considered delivered when the TRS facility's equipment accepts the call from the local exchange carrier (LEC) and the public switched network actually delivers the call to the TRS facility.

(B) Abandoned calls shall be included in the speed-of-answer calculation.

(C) A TRS provider's compliance with this rule shall be measured on a daily basis.

(D) The system shall be designed to a P.01 standard.

(E) A LEC shall provide the call attempt rates and the rates of calls blocked between the LEC and the TRS facility to relay administrators and TRS providers upon request.

The Virgin Islands' Telecommunications Relay Service provides adequate staffing to provide callers with efficient access to the relay. The probability of a busy response due to Communication Assistant unavailability is functionally equivalent to what a voice caller would experience in attempting to reach a party through the voice telephone network.

Except during network failure, Virgin Islands Relay answers eighty-five percent (85%) of all calls within 10 seconds on a daily basis including abandoned calls. This results in the caller's call immediately being placed, not put in a queue or on hold on a daily basis for the Virgin Islands. Virgin Islands Relay begins measuring Average Answer time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as the equipment used by Virgin Islands Relay accepts the call from the LEC and the public switched network delivers the call to the TRS center, Virgin Islands Relay starts its call detail record to capture answer time data.

Call Blockage

The Virgin Islands Relay is designed to a P.01 standard. No more than one call in 100 will receive a busy signal when calling the relay center at the busiest hour. Virgin Islands Relay defines "blockage" as any call that arrives at the relay switch but is not answered due to the customer receiving a busy signal.

There has been no blockage at our switch points because our incoming network capacity is well in excess of any peak load requirements. Relay users never receive a busy signal from Virgin Islands Relay. If a relay user does reach a busy signal, there is a problem somewhere else in the network that is not under Virgin Islands Relay's control (i.e. local network, long distance network, equipment, etc.) Although very unlikely, in the event the switch used by Virgin Islands Relay is down, calls are automatically rerouted or intercept messages are used rather than busy signals.

The systems used by Virgin Islands Relay are designed to prevent blockage. The switch used by Virgin Islands Relay is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to insure quality and reliable performance, making blockage or any downtime nearly impossible. The system auto-detects any problems and moves to the secondary system immediately if necessary.

Another measure Virgin Islands Relay has taken to prevent blocking is to use networks that make use of SONET survivability technology. All of the networks controlled by Virgin Islands Relay - from the point a relay user picks up the phone in their home or business, through the relay and then back to the other phone being called - are redundant and can survive fiber cuts and other such outages. This allows Virgin Islands Relay to maintain its zero percent blockage rate.

Virgin Islands Relay measures, records and reports its answer performance and blockage rate information to Innovative Telephone and abides by the FCC rules (i.e. a LEC shall provide the call attempt and the rates of calls blocked between the LEC and the relay center upon request).

Hamilton's transmission circuits meet or exceed industry interexchange performance standards for circuit loss and noise. Hamilton has no busies at its center because of a lack of facilities. Hamilton's system is currently provisioned in such a manner that call blockage or busies never happen. This meets the FCC requirements. In the last 12 months Hamilton has experienced absolutely no call blockage.

(3) Equal access to interexchange carriers. TRS users shall have access to their chosen interexchange carrier through the TRS, and to all other operator services, to the same extent that such access is provided to voice users.

Virgin Islands Relay provides relay users with access to the interexchange carrier of their choice through the TRS, and to all other operator services, to the same extent that such access is provided to voice users. InterLATA long distance toll charges are recorded and billed by the relay user's carrier of choice in the same manner as the carrier bills that customer for long distance calls made without the relay. On each InterLATA call, Virgin Islands Relay forwards the appropriate information digits (identifying the call as a relay call), calling number and called number as part of the call information so that the long distance company can bill the customer at correct functionally equivalent rate through their normal billing mechanisms. Calling card or credit card billing is handled in the same manner. Virgin Islands Relay has provisioned the necessary trunks at each of its relay switching tandems for all long distance companies participating in equal access so that they can receive Virgin Islands Relay traffic. Virgin Islands Relay offers equal access to all carriers who choose to participate.

When a call has been defined as a long distance call, Virgin Islands Relay sends this call to its relay switching tandem. The correct carrier code is sent with each call so that the tandem sends the call to the customer's carrier. Each call is identified as a relay call. If a relay user has signed up with his/her carrier of choice for a "relay" discount, the carrier will bill the call as a relay call and pass on any discounts. Relay users will receive one bill from their carrier of choice just like they do for all of their direct calls. Virgin Islands Relay explains this type of billing arrangement through Customer Service so that relay users understand how to select a carrier and find the best long distance rates.

Virgin Islands Relay provides relay users with access to all other Operator Services to the same extent that such access is provided to voice users. Operator services are handled in the same manner as explained above. All operator assisted calls are sent to the customers' carrier of choice for processing and billing.

The type of arrangement explained above gives the control to the relay user. The relay user can pick their carrier of choice, receive one bill for all of their calls, and the relay user can shop for the best rates, just like they do today for calls not made through the relay. The relay user can continue to work with one carrier and the relay remains invisible.

The customer profile program used by Virgin Islands Relay is based on the relay users' ANI that provides automatic connection to the carrier of choice made by the relay user. Relay users complete a customer profile with their carrier information and Virgin Islands Relay adds this information to its database. On each subsequent relay call relay users are automatically connected to their carrier of choice. Relay users can also notify the Communication Assistant of their carrier of choice when making a long distance relay call. In the event a relay user elects to change his/her carrier of choice, the Communication Assistant is able to do so. The Communication Assistant will also explain carrier of choice to a relay user when asked.

Virgin Islands Relay offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay. In addition to 1010 dial-around, Virgin Islands Relay has 13 interexchange carriers available on its platform.

In order to obtain new carriers on its platform, Virgin Islands Relay contacts all carriers that are requested by Virgin Islands relay users to see if they will participate in relay equal access. Virgin Islands Relay then works diligently through ordering and testing phases with that carrier to ensure that the carrier becomes available to Virgin Islands relay users. Hamilton maintains a list of participating long distance carriers for the Virgin Islands Telecommunications Relay Service and makes this information available to relay users.

(4) TRS facilities.

(i) TRS shall operate every day, 24 hours a day. Relay services that are not mandated by this Commission need not be provided every day, 24 hours a day, except VRS.

The Virgin Islands Telecommunications Relay Service provides telecommunications relay service 24 hours a day, 7 days a week.

(ii) TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

The facility used by Virgin Islands Relay has the needed redundancy in switching mechanisms and telecommunication facilities to ensure operation 24 hours a day. Virgin Islands Relay is operated from a an in-state center located in Aurora, Nebraska. Virgin Islands Relay calls automatically overflow during peak volume times and during any failure of switching or telecommunications facilities to other centers operated by the Virgin Islands Relay provider. This ensures continuous operation of the Virgin Islands Relay.

Switching System

Virgin Islands Relay makes use of an Excel telecommunications switch. The GS-2000 is a programmable, non-blocking switching system that supports a wide range of digital telephony services. Its open, modular architecture and programmable interfaces allow for simplified and cost-effective application development. The GS-2000 supports up to 2,048 ports in a single high-density system. Its components include a matrix CPU, network interface cards, Digital

Signal Processing service cards and SS7 packet engine cards. The GS-2000 adapts to all standard network and line interfaces, including T1, E1, J1, and ISDN PRI.

The InterCall Switch Operating System (ISOS) was developed in response to the need to quickly develop applications on the Excel Inc. programmable switching platforms.

The ISOS can simply be loaded on a UNIX host, and plugged into the switch to offer basic tandem type switching capabilities including routing and call detail records. The ISOS is a fully operational basic switch and has great flexibility.

The workstation application was developed to take advantage of the power and flexibility of the ISOS operating system. It provides a high level of Communication Assistant control processing with complete flexibility to connect any type of call protocol to any other type of call protocol. A database was developed to maintain a profile of each caller to speed up call connections and to provide information for tailored call processing.

The switching system used by Virgin Islands Relay contains a fully redundant central processing unit on hot standby with automatic failover. This is to ensure that no calls are dropped due to technical failure. It also has a redundant power supply on hot standby. Backup control and database servers are also on hot standby with automatic failover. Virgin Islands Relay maintains an inventory of spare critical components for the switching system onsite to ensure that the required levels of service are met (listed below).

The switch used by Virgin Islands Relay is a high-speed, stand-alone, non-blocking digital switching matrix. The system is fully redundant to insure quality, reliable performance. The system utilizes a standard T1 interface that enables it to be linked to other digital switches. All cards and power supplies within the system are redundant which gives us the flexibility to switch from one side of the switch to the other to perform updates or to troubleshoot without interrupting call processing. The system is set up to automatically access the secondary operating system on the switch with no human intervention. The system auto-detects any problems and moves to the secondary system immediately if necessary.

The on-sight switching system spare equipment includes:

D4 channel bank
All required channel bank cards
T1 CSU packs
Switch T-1 card
Switch conference card

If one of the switching systems used by Virgin Islands Relay cannot be returned to service by transferring control to redundant equipment, the calls automatically will overflow to another switching system. Switching systems used by Virgin Islands Relay are designed to provide a very high level of operational security with two fully redundant processors and power supplies in each switch. Each fully redundant control system, which includes keyboard, monitor and printer capabilities, are used to control and monitor each of the switching systems. The control systems

provide online system monitoring and real-time programming capabilities that will not take the system off-line and the ability to perform preventative maintenance or repair while the system is online. Remote capabilities are also provided so the system can be remotely monitored, reconfigured or controlled as necessary. All of this is provided to insure the required levels of service are always met.

Backup Power

The backup power supply system fully complies with and exceeds the requirements for uninterruptible power. An uninterruptible power source with full battery backup is available to operate the Virgin Islands Relay at full capacity for extended periods of time. Virgin Islands Relay also has automatically activated generator back-up capabilities allowing it to provide relay service for days and weeks at a time during power outages.

This power system supports the switch system and its peripherals, switch room and CA work site emergency lights and system alarms, CA consoles/terminals, Call Detail Recording, Supervisory and traffic monitoring consoles, Customer Service and administrative phone and voice mail systems, and building security systems.

Virgin Islands Relay's relay provider maintains auxiliary power sources for nine central offices in addition to all its relay centers. All of Hamilton's back-up power systems are comparable to central office auxiliary power sources in terms of time and capacity. Please Appendix C for Hamilton's Disaster Recovery Plan. Please see Tab 2 for contractual information regarding Virgin Islands Relay's uninterruptible power source.

(5) Technology. No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecommunications to person with disabilities. TRS facilities are permitted to use SS7 technology or any other type of similar technology to enhance the functional equivalency and quality of TRS. TRS facilities that utilize SS7 technology shall be subject to the Calling Party Telephone Number rules set forth at 47 CFR 64.1600 et seq.

Using flexible software and hardware (i.e. common equipment frames, standard T1 interfaces, windows NT servers, UNIX operating System, etc.) where components can easily be modified in order to accommodate new technology, the platform used by Virgin Islands Relay is ideal for today's rapidly changing technologically advanced environment. Virgin Islands Relay's relay provider can quickly add new features and make changes based on the input from relay users and from our internal evaluations. Virgin Islands Relay's relay provider takes advantage of innovations and technological improvements to enhance the Virgin Islands' relay service.

As a telecommunications company, Virgin Islands Relay's relay provider is on the leading edge of new technology. Hamilton is an Internet provider, cable television provider, computer supplier and a general telecommunications provider. There are new advances in these areas every day. Hamilton is constantly watching for opportunities to use the technological advances in these areas in relay. Hamilton keeps Innovative Telephone informed about any new types of technology that become available.

Virgin Islands Relay relies on user feedback a great deal to set its technological development priorities. Virgin Islands Relay is also involved in several industry groups to stay abreast of the latest FCC activities, user needs, and developing technology.

(6) Caller ID. When a TRS facility is able to transmit any calling party identifying information to the public network, the TRS facility must pass through, to the called party, at least one of the following: the number of the TRS facility, 711, or the 10-digit number of the calling party.

True Caller ID

Virgin Islands Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the called party's Caller ID box. Virgin Islands Relay provides this information on all call types and on all carriers. Virgin Islands Relay brings true functional equivalence to Virgin Islands Caller ID relay users.

Virgin Islands Relay receives and passes calling line identification information, including blocking information from all users calling through the relay service. If the Caller ID block indicator is enabled on the call when Virgin Islands Relay receives it, the relay caller's number is not passed on to the called party. The call blocking information passes through automatically to the called party with no relay intervention. The relay user has complete control over blocking information with their local phone company. Please see Appendix A for more information.

TAB 5

Functional Standards

(c) Functional standards--

(1) Consumer complaint logs.

(i) States and interstate providers must maintain a log of consumer complaints including all complaints about TRS in the state, whether filed with the TRS provider or the State, and must retain the log until the next application for certification is granted. The log shall include, at a minimum, the date the complaint was filed, the nature of the complaint, the date of resolution, and an explanation of the resolution.

Virgin Islands Relay tracks all TRS complaints and all other customer service activity. Virgin Islands Relay maintains a log of consumer complaints alleging a violation of federal minimum standards as it relates to the provisioning of Telecommunications Relay Service and retains the log for the State until the FCC grants the next application for certification.

All complaints made through the toll-free Customer Service number, the customer inquiry form or on-line feedback form, whether in writing or in person, are documented in the Customer Service database. All resolutions are also documented in this database. All information is kept on file and available to Innovative and the FCC. Each database record includes the name and/or address of the complainant, the date and time received, the Communication Assistant identification number, the nature of the complaint, the specific relief or satisfaction sought, the result of the investigation, the resolution of the complaint and date of the resolution. The customer service representative responsible for handling the complaint is also indicated.

Innovative's complaint log is associated with the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data

- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breech
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems
- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access

(ii) Beginning July 1, 2002, states and TRS providers shall submit summaries of logs indicating the number of complaints received for the 12-month period ending May 31 to the Commission by July 1 of each year. Summaries of logs submitted to the Commission on July 1, 2001 shall indicate the number of complaints received from the date of OMB approval through May 31, 2001.

Virgin Islands Relay reports complaint activity to Innovative on a monthly basis. Innovative has included copies of its 2006 and 2007 logs in this application for renewal of current state certification for your information. These logs are included in Appendix F. Virgin Islands Relay issues each complaint a Record ID number to enable Innovative Telephone and the FCC to quickly and easily identify the details of those particular complaints and contact information of the complainant.

(2) Contact persons. Beginning on June 30, 2000, State TRS Programs, interstate TRS providers, and TRS providers that have state contracts must submit to the Commission a contact person and/or office for TRS consumer information and complaints about a certified State TRS Program's provision of intrastate TRS, or, as appropriate, about the TRS provider's service. This submission must include, at a minimum, the following:

(i) The name and address of the office that receives complaints, grievances, inquiries, and suggestions;

(ii) Voice and TTY telephone numbers, fax number, e-mail address, and web address; and

(iii) The physical address to which correspondence should be sent.

Innovative has submitted to the Commission a contact person for TRS consumer information and complaints about Intrastate TRS. The submission includes the name and address of the State office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, web address, and physical address to which correspondence should be sent. Following is the name of the contact at Innovative Telephone for those purposes:

Mickey Breton
Director of Business Offices
Innovative Telephone
PO Box 6001
Charlotte Amalie, St. Thomas, USVI 00804
Phone: (340)-715-8349

The Hamilton Telephone Company d/b/a Hamilton Telecommunications, the provider of Virgin Islands Relay, has submitted to the Commission a contact person for TRS consumer information and complaints about Hamilton's service. The submission includes the name and address of the state office that receives complaints, grievances, inquiries and suggestions, voice and TTY telephone numbers, fax number, e-mail address, and physical address to which correspondence should be sent. Following is the name of the contact at The Hamilton Telephone Company for those purposes:

Dixie Ziegler
Vice President of Relay
Hamilton Relay, Inc.
1001 12th Street
Aurora, NE 68818
Voice/TTY: 402-694-3656
Toll Free: 800-618-4781
Fax: 402-694-5037
E-mail: dixie.ziegler@hamiltonrelay.com
Website: www.hamiltonrelay.com

(3) Public access to information. Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions in telephone directories, through directory assistance services, and incorporation of TTY numbers in telephone directories, shall assure that callers in their service areas are aware of the availability and use of all forms of TRS. Efforts to educate the public about TRS should extend to all segments of the public, including individuals who are hard of hearing, speech disabled, and senior citizens as well as members of the general population. In addition, each common carrier providing telephone voice transmission services shall conduct, not later than October 1, 2001, ongoing education and outreach programs that publicize the availability of 711 access to TRS in a manner reasonably designed to reach the largest number of consumers possible.

Community Outreach, Public Relations and Educational Programs

Virgin Islands Relay provides a community and business outreach program that educates all people in Virgin Islands about the relay service. This program goes beyond gaining customer feedback. Rather, this program *educates* and markets relay services (i.e. public awareness of 711 and TRS) across Virgin Islands. Hearing people hanging up on the relay is still the number one outreach problem. The outreach programs Virgin Islands Relay uses focus on the need to educate the hearing community, as you will see below. This meets the FCC requirements, which calls for outreach to all telephone users. Virgin Islands Relay performs outreach activities for all relay user communities via promotional events, presentations, workshops, and instructional seminars. Virgin Islands Relay always adjusts its programs to meet the specific needs of every audience.

The outreach program Virgin Islands Relay uses specifically targets deaf, hard of hearing, late deafened, deaf-blind, speech disabled individuals as well as their family and friends. Virgin Islands Relay also targets voice users, businesses and professionals, trade shows, civic organizations, public schools and university students. Appendix G contains a list of Outreach activities performed in Virgin Islands, copies of directory pages, billing inserts, as well as educational brochures which illustrate the various call types available through Virgin Islands Relay.

As discussed previously, Virgin Islands Relay performs a variety of activities to inform the telecommunications-using public about relay. From attendance at a variety of activities, which cater to relay users, (Virgin Islands Relay participates in Virgin Islands organizations' activities that serve relay users) to educating business and professionals, trade shows, civic organizations, public schools and university students and other groups about relay, Virgin Islands Relay is promoting the use of the relay. Virgin Islands Relay understands that these groups could connect more effectively with deaf and hard of hearing customers/clients through use of and knowledge of telephone relay services.

The Outreach programs Virgin Islands Relay uses include media advertisements, demonstration of equipment and distribution of informational materials describing how to use the relay service. The Outreach Team presents relay information to organizations and groups, including relay user groups, meet with businesses, schools and other public and private entities (including libraries) to describe relay and how it works, and meets with individuals or groups of relay users to demonstrate equipment and answer questions. The Virgin Islands Relay Outreach Team works with the elderly and speech disabled to promote use of the relay. Virgin Islands Relay also uses public relations campaigns and uses media advertisements to expose relay to a broader audience of people throughout Virgin Islands. As stated previously, Virgin Islands Relay has had great success by personalizing its outreach efforts through an in-state outreach program. The tactics Virgin Islands Relay use to accomplish all of this are listed below.

- PSAs and Other Media Advertisement
- Educational Videos
- Press Releases
- Presentations
- Exhibits:

- Train the Trainers Program
- One-on-One Visits/Hard of Hearing and Elderly Strategies
- Outreach to Businesses
- FCC Payphone Relay Plan
- Town Hall Meetings
- Outreach to Spanish
- Customized Outreach Materials
- Promotional Materials
- Relay Brochure
- Description of Complaint Procedures in Printed Materials
- Newsletters
- Web site
- Bill Inserts and Directory Pages
- Involvement of Deaf and State Agencies

(4) Rates. TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

As explained in Tab 4, Virgin Islands Relay's provider performs no billing. All billing is performed by the relay users' carrier of choice for InterLATA toll calls. Thus the relay users' carrier of choice bills all InterLATA toll calls at their applicable discounted rate for relay users. Virgin Islands Relay's provider forwards the appropriate information digits identifying the call as a relay call to the carrier so that it can be identified as a relay call, rated and billed accordingly by the carrier. Each carrier providing long distance service to relay users is responsible to ensure that TRS users shall pay no greater than the rates paid for functionally equivalent voice communication services.

(5) Jurisdictional separation of costs.

(i) General. Where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set forth in the Commission's regulations adopted pursuant to section 410 of the Communications Act of 1934, as amended.

Virgin Islands Relay's provider presents NECA with a billing statement for all interstate minutes of relay in accordance with the requirements of NECA and consistent with FCC rulings. Intrastate costs are covered in Innovative Telephone's rates for local telephone service.

(ii) Cost recovery. Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism. Except as noted in this paragraph, with respect to VRS, costs caused by intrastate TRS shall be recovered from the intrastate jurisdiction. In a state that has a certified program under § 64.605, the state agency providing TRS shall, through the state's regulatory agency, permit a common carrier to recover costs incurred in providing TRS by a method consistent with the requirements of this section. Costs caused by the provision of interstate and intrastate VRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism.

Please refer to Tab 7 for a description of the Virgin Islands funding mechanism.

(iii) Telecommunications Relay Services Fund. Effective July 26, 1993, an Interstate Cost Recovery Plan, hereinafter referred to as the TRS Fund, shall be administered by an entity selected by the Commission (administrator). The initial administrator, for an interim period, will be the National Exchange Carrier Association, Inc.

Not applicable.

(A) Contributions. Every carrier providing interstate telecommunications services shall contribute to the TRS Fund on the basis of interstate end-user telecommunications revenues as described herein. Contributions shall be made by all carriers who provide interstate services, including, but not limited to, cellular telephone and paging, mobile radio, operator services, personal communications service (PCS), access (including subscriber line charges), alternative access and special access, packet-switched, WATS, 800, 900, message telephone service (MTS), private line, telex, telegraph, video, satellite, intraLATA, international and resale services.

Not applicable.

(B) Contribution computations. Contributors' contribution to the TRS fund shall be the product of their subject revenues for the prior calendar year and a contribution factor determined annually by the Commission. The contribution factor shall be based on the ratio between expected TRS Fund expenses to interstate end-user telecommunications revenues. In the event that contributions exceed TRS payments and administrative costs, the contribution factor for the following year will be adjusted by an appropriate amount, taking into consideration projected cost and usage changes. In the event that contributions are inadequate, the fund administrator may request authority from the Commission to borrow funds commercially, with such debt secured by future years' contributions. Each subject carrier must contribute at least $25 per year. Carriers whose annual contributions total less than $1,200 must pay the entire contribution at the beginning of the contribution period. Service providers whose contributions total $1,200 or more may divide their contributions into equal monthly payments. Carriers shall complete and submit, and contributions shall be based on, a "Telecommunications Reporting Worksheet" (as published by the Commission in the Federal Register). The worksheet shall be certified to by an officer of the contributor, and subject to verification by the Commission or the administrator at the discretion of the Commission. Contributors' statements in the worksheet shall be subject to the provisions of section 220 of the Communications Act of 1934, as amended. The fund administrator may bill contributors a separate assessment for reasonable administrative expenses and interest resulting from improper filing or overdue contributions. The Chief of the Consumer & Governmental Affairs Bureau may waive, reduce, modify or eliminate contributor reporting requirements that prove unnecessary and require additional reporting requirements that the Bureau deems necessary to the sound and efficient administration of the TRS Fund.

Not applicable.

(C) Data collection from TRS Providers. TRS providers shall provide the administrator with true and adequate data necessary to determine TRS fund revenue requirements and payments. TRS providers shall provide the administrator with the following: total TRS minutes of use, total interstate TRS minutes of use, total TRS operating expenses and total TRS investment in general accordance with part 32 of the Communications Act, and other historical or projected information reasonably requested by the administrator for purposes of computing payments and revenue requirements. The administrator and the Commission shall have the authority to examine, verify and audit data received from TRS providers as necessary to assure the accuracy and integrity of fund payments.

Not applicable.

(D) [Reserved]

(E) Payments to TRS Providers. TRS Fund payments shall be distributed to TRS providers based on formulas approved or modified by the Commission. The administrator shall file schedules of payment formulas with the Commission. Such formulas shall be designed to compensate TRS providers for reasonable costs of providing interstate TRS, and shall be subject to Commission approval. Such formulas shall be based on total monthly interstate TRS minutes of use. TRS minutes of use for purposes of interstate cost recovery under the TRS Fund are defined as the minutes of use for completed interstate TRS calls placed through the TRS center beginning after call set-up and concluding after the last message call unit. In addition to the data required under paragraph (c)(5)(iii)(C) of this section, all TRS providers, including providers who are not interexchange carriers, local exchange carriers, or certified state relay providers, must submit reports of interstate TRS minutes of use to the administrator in order to receive payments. The administrator shall establish procedures to verify payment claims, and may suspend or delay payments to a TRS provider if the TRS provider fails to provide adequate verification of payment upon reasonable request, or if directed by the Commission to do so. The TRS Fund administrator shall make payments only to eligible TRS providers operating pursuant to the mandatory minimum standards as required in § 64.604, and after disbursements to the administrator for reasonable expenses incurred by it in connection with TRS Fund administration. TRS providers receiving payments shall file a form prescribed by the administrator. The administrator shall fashion a form that is consistent with parts 32 and 36 procedures reasonably tailored to meet the needs of TRS providers. The Commission shall have authority to audit providers and have access to all data, including carrier specific data, collected by the fund administrator. The fund administrator shall have authority to audit TRS providers reporting data to the administrator. The formulas should appropriately compensate interstate providers for the provision of VRS, whether intrastate or interstate.

Not applicable.

(F) TRS providers eligible for receiving payments from the TRS Fund are:

(1) TRS facilities operated under contract with and/or by certified state TRS programs pursuant to § 64.605; or

(2) TRS facilities owned by or operated under contract with a common carrier providing interstate services operated pursuant to § 64.604; or

(3) Interstate common carriers offering TRS pursuant to § 64.604.

Not applicable.

(G) Any eligible TRS provider as defined in paragraph (c)(5)(iii)(F) of this section shall notify the administrator of its intent to participate in the TRS Fund thirty (30) days prior to submitting reports of TRS interstate minutes of use in order to receive payment settlements for interstate TRS, and failure to file may exclude the TRS provider from eligibility for the year.

Not applicable.

(H) Administrator reporting, monitoring, and filing requirements. The administrator shall perform all filing and reporting functions required in paragraphs (c)(5)(iii)(A) through (c)(5)(iii)(J) of this section. TRS payment formulas and revenue requirements shall be filed with the Commission on May 1 of each year, to be effective the following July 1. The administrator shall report annually to the Commission an itemization of monthly administrative costs which shall consist of all expenses, receipts, and payments associated with the administration of the TRS Fund. The administrator is required to keep the TRS Fund separate from all other funds administered by the administrator, shall file a cost allocation manual (CAM) and shall provide the Commission full access to all data collected pursuant to the administration of the TRS Fund. The administrator shall account for the financial transactions of the TRS Fund in accordance with generally accepted accounting principles for federal agencies and maintain the accounts of the TRS Fund in accordance with the United States Government Standard General Ledger. When the administrator, or any independent auditor hired by the administrator, conducts audits of providers of services under the TRS program or contributors to the TRS Fund, such audits shall be conducted in accordance with generally accepted government auditing standards. In administering the TRS Fund, the administrator shall also comply with all relevant and applicable federal financial management and reporting statutes. The administrator shall establish a non-paid voluntary advisory committee of persons from the hearing and speech disability community, TRS users (voice and text telephone), interstate service providers, state representatives, and TRS providers, which will meet at reasonable intervals (at least semi-annually) in order to monitor TRS cost recovery matters. Each group shall select its own representative to the committee. The administrator's annual report shall include a discussion of the advisory committee deliberations.

Not applicable.

(I) Information filed with the administrator. The administrator shall keep all data obtained from contributors and TRS providers confidential and shall not disclose such data in company-specific form unless directed to do so by the Commission. Subject to any restrictions imposed by the Chief of the Consumer & Governmental Affairs Bureau, the TRS Fund administrator may share data obtained from carriers with the administrators of the universal support mechanisms (See 47 CFR 54.701 of this chapter), the North American Numbering Plan administration cost

recovery (See 47 CFR 52.16 of this chapter), and the long-term local number portability cost recovery (See 47 CFR 52.32 of this chapter). The TRS Fund administrator shall keep confidential all data obtained from other administrators. The administrator shall not use such data except for purposes of administering the TRS Fund, calculating the regulatory fees of interstate common carriers, and aggregating such fee payments for submission to the Commission. The Commission shall have access to all data reported to the administrator, and authority to audit TRS providers. Contributors may make requests for Commission nondisclosure of company-specific revenue information under § 0.459 of this chapter by so indicating on the Telecommunications Reporting Worksheet at the time that the subject data are submitted. The Commission shall make all decisions regarding nondisclosure of company-specific information.

Not applicable.

(J) The administrator's performance and this plan shall be reviewed by the Commission after two years.

Not applicable.

(K) All parties providing services or contributions or receiving payments under this section are subject to the enforcement provisions specified in the Communications Act, the Americans with Disabilities Act, and the Commission's rules.

Not applicable.

(6) Complaints.

(i) Referral of complaint. If a complaint to the Commission alleges a violation of this subpart with respect to intrastate TRS within a state and certification of the program of such state under § 64.605 is in effect, the Commission shall refer such complaint to such state expeditiously.

(ii) Intrastate complaints shall be resolved by the state within 180 days after the complaint is first filed with a state entity, regardless of whether it is filed with the state relay administrator, a state PUC, the relay provider, or with any other state entity.

Innovative Telephone will resolve all intrastate complaints within 180 days after the complaint is first filed with the State, regardless of whether the complaint is filed with the state relay administrator, a state PUC, the relay provider or with any other state entity.

(iii) Jurisdiction of Commission. After referring a complaint to a state entity under paragraph (c)(6)(i) of this section, or if a complaint is filed directly with a state entity, the Commission shall exercise jurisdiction over such complaint only if:

(A) Final action under such state program has not been taken within:

(1) 180 days after the complaint is filed with such state entity; or

(2) A shorter period as prescribed by the regulations of such state; or

(B) The Commission determines that such state program is no longer qualified for certification under § 64.605.

Innovative understands that if it does not provide a resolution to a complaint that the FCC may exercise jurisdiction.

(iv) The Commission shall resolve within 180 days after the complaint is filed with the Commission any interstate TRS complaint alleging a violation of section 225 of the Act or any complaint involving intrastate relay services in states without a certified program. The Commission shall resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

Innovative understands that the Commission will resolve intrastate complaints over which it exercises jurisdiction under paragraph (c)(6)(iii) of this section within 180 days.

(v) Complaint Procedures. Complaints against TRS providers for alleged violations of this subpart may be either informal or formal.

(A) Informal Complaints.

(1) Form. An informal complaint may be transmitted to the Consumer & Governmental Affairs Bureau by any reasonable means, such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate a complainant's hearing or speech disability.

(2) Content. An informal complaint shall include the name and address of the complainant; the name and address of the TRS provider against whom the complaint is made; a statement of facts supporting the complainant's allegation that the TRS provided it has violated or is violating section 225 of the Act and/or requirements under the Commission's rules; the specific relief or satisfaction sought by the complainant; and the complainant's preferred format or method of response to the complaint by the Commission and the defendant TRS provider (such as letter, facsimile transmission, telephone (voice/TRS/TTY), Internet e-mail, or some other method that would best accommodate the complainant's hearing or speech disability).

(3) Service; designation of agents. The Commission shall promptly forward any complaint meeting the requirements of this subsection to the TRS provider named in the complaint. Such TRS provider shall be called upon to satisfy or answer the complaint within the time specified by the Commission. Every TRS provider shall file with the Commission a statement designating an agent or agents whose principal responsibility will be to receive all complaints, inquiries, orders, decisions, and notices and other pronouncements forwarded by the Commission. Such designation shall include a name or department designation, business address, telephone number (voice and TTY), facsimile number and, if available, internet e-mail address.

(B) Review and disposition of informal complaints.

(1) Where it appears from the TRS provider's answer, or from other communications with the parties, that an informal complaint has been satisfied, the Commission may, in its discretion, consider the matter closed without response to the complainant or defendant. In all other cases, the Commission shall inform the parties of its review and disposition of a complaint filed under this subpart. Where practicable, this information shall be transmitted to the complainant and defendant in the manner requested by the complainant (e.g., letter, facsimile transmission, telephone (voice/TRS/TTY) or Internet e-mail.

(2) A complainant unsatisfied with the defendant's response to the informal complaint and the staff's decision to terminate action on the informal complaint may file a formal complaint with the Commission pursuant to paragraph (c)(6)(v)(C) of this section.

Innovative will assist as necessary in this process.

(C) Formal complaints. A formal complaint shall be in writing, addressed to the Federal Communications Commission, Enforcement Bureau, Telecommunications Consumer Division, Washington, DC 20554 and shall contain:

(1) The name and address of the complainant,

(2) The name and address of the defendant against whom the complaint is made,

(3) A complete statement of the facts, including supporting data, where available, showing that such defendant did or omitted to do anything in contravention of this subpart, and

(4) The relief sought.

(D) Amended complaints. An amended complaint setting forth transactions, occurrences or events which have happened since the filing of the original complaint and which relate to the original cause of action may be filed with the Commission.

(E) Number of copies. An original and two copies of all pleadings shall be filed.

(F) Service.

(1) Except where a complaint is referred to a state pursuant to §64.604(c)(6)(i), or where a complaint is filed directly with a state entity, the Commission will serve on the named party a copy of any complaint or amended complaint filed with it, together with a notice of the filing of the complaint. Such notice shall call upon the defendant to satisfy or answer the complaint in writing within the time specified in said notice of complaint.

(2) All subsequent pleadings and briefs shall be served by the filing party on all other parties to the proceeding in accordance with the requirements of § 1.47 of this chapter. Proof of such service shall also be made in accordance with the requirements of said section.

(G) Answers to complaints and amended complaints. Any party upon whom a copy of a complaint or amended complaint is served under this subpart shall serve an answer within the time specified by the Commission in its notice of complaint. The answer shall advise the parties

and the Commission fully and completely of the nature of the defense and shall respond specifically to all material allegations of the complaint. In cases involving allegations of harm, the answer shall indicate what action has been taken or is proposed to be taken to stop the occurrence of such harm. Collateral or immaterial issues shall be avoided in answers and every effort should be made to narrow the issues. Matters alleged as affirmative defenses shall be separately stated and numbered. Any defendant failing to file and serve an answer within the time and in the manner prescribed may be deemed in default.

(H) Replies to answers or amended answers. Within 10 days after service of an answer or an amended answer, a complainant may file and serve a reply which shall be responsive to matters contained in such answer or amended answer and shall not contain new matter. Failure to reply will not be deemed an admission of any allegation contained in such answer or amended answer.

(I) Defective pleadings. Any pleading filed in a complaint proceeding that is not in substantial conformity with the requirements of the applicable rules in this subpart may be dismissed.

Innovative will assist as necessary in this process.

Supplemental Information:

Intrastate Virgin Islands Relay complaints are processed in the following manner for Innovative Telephone by its TRS provider:

Trained personnel located within the Virgin Islands answer all Virgin Islands Relay Customer Service calls. Virgin Islands Relay provides a 24 hour a day, 7 days a week customer service via a toll-free telephone number, accessible from anywhere in the U.S., to assist TTY and voice callers with Virgin Islands TRS inquiries and complaints. Customers may also contact Virgin Islands Relay via e-mail and through the Virgin Islands relay web-site; in person; as well as in writing. Any caller to the relay center having a complaint can reach a supervisor or customer service representative while still on line during a relay call. Virgin Islands Relay processes any complaints, which originate via e-mail, fax, telephone, regular mail, at the workstations, etc.

Ultimately responsible for processing all inquiries, comments and complaints is Virgin Islands' Relay Center Manager. The Vice President of Relay also views all complaint information.

In the event of a complaint regarding the Virgin Islands Relay, trained staff will follow an established procedure of complaint resolution. This process varies depending on the gravity of the situation.

- A Complaint involving a Communication Assistant is directed to the Communication Assistant's Supervisor and the Lead Supervisor. Constructive feedback will be shared with the Communication Assistant and appropriate coaching, re-training and counseling steps will be taken by the primary Supervisor to resolve the situation. Virgin Islands Relay's detailed call records show each key command (not actual text) the CA makes. Virgin Islands Relay can easily investigate Virgin Islands Relay CA complaints and take disciplinary action when needed.

- Complaints regarding service/procedure issues are directed to the appropriate internal personnel. Technical issues are given to the technical support staff Virgin Islands Relay uses and addressed immediately. Procedural issues are discussed at internal quality meetings.

All complaints are reviewed by the Virgin Islands Relay Center Manager to ensure that any complaints have been resolved to the customer's satisfaction. The Customer Service Team resolves most customer service complaints. If further action is needed, the complaint is escalated to the Vice President of Relay Service for Hamilton, and then to Innovative Telephone when needed. All complaints are resolved within 10 calendar days depending on the complexity of the problem.

If the user is not satisfied with the resolution of the complaint by Virgin Islands Relay or with any action taken, Virgin Islands Relay's monthly report to Innovative Telephone will so state. The user then has the opportunity and is given written notice of that opportunity by Virgin Islands Relay to have the complaint and action of Virgin Islands Relay reviewed by Innovative Telephone for such action as it may deem appropriate in accordance with its rules and regulation. Innovative Telephone will act on such complaint no later than 180 days from the filing of the complaint.

Innovative will process all complaints referred by the Federal Communication's Commission for intrastate Telecommunications Relay Service for the Virgin Islands. Innovative will cooperate in the investigation or resolution of any and all complaints concerning the Virgin Islands Relay with the Federal Communication's Commission.

(7) Treatment of TRS customer information. Beginning on July 21, 2000, all future contracts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service provision. Such data may not be used for any purpose other than to connect the TRS user with the called parties desired by that TRS user. Such information shall not be sold, distributed, shared or revealed in any other way by the relay center or its employees, unless compelled to do so by lawful order.

All contracts between Innovative and The Hamilton Telephone Company d/b/a Hamilton Telecommunications provide for the transfer of TRS customer profile data from Hamilton to the incoming TRS vendor. Hamilton will provide the above mentioned data to the new vendor at least 60 days prior to the conclusion or termination of the contract.

Hamilton does not and will not use this data for any purpose other than connecting the Virgin Islands Relay user to his/her called party. Hamilton has not and will never make any relay information available for sale or distribution. Hamilton will not sell, distribute, share or reveal in any way the information referenced above.

TAB 6

State Certification

§64.605 STATE CERTIFICATION.

(a) State documentation—(1) Certified state program. Any state, through its office of the governor or other delegated executive office empowered to provide TRS, desiring to establish a state program under this section shall submit, not later than October 1, 1992, documentation to the Commission addressed to the Federal Communications Commission, Chief, Consumer & Governmental Affairs Bureau, TRS Certification Program, Washington, DC 20554, and captioned "TRS State Certification Application." All documentation shall be submitted in narrative form, shall clearly describe the state program for implementing intrastate TRS, and the procedures and remedies for enforcing any requirements imposed by the state program. The Commission shall give public notice of states filing for certification including notification in the Federal Register.

Please refer to Tabs 3, 4 and 5 for a paragraph by paragraph response describing the Virgin Islands' program for implementing and managing intrastate TRS service. The Virgin Island is currently certified to provide intrastate TRS through July 26, 2008. This application is submitted to re-certify the Virgin Islands for an additional five years.

(b) (1) Requirements for state certification. After review of state documentation, the Commission shall certify, by letter, or order, the state program if the Commission determines that the state certification documentation:

(i) Establishes that the state program meets or exceeds all operational, technical, and functional minimum standards contained in §64.604;

Please refer to Tabs 3, 4 and 5 of this application for a description of how the Virgin Islands meets or exceeds all operational, technical and functional minimum standards contained in §64.604.

(ii) Establishes that the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints; and

Please refer to Tabs 3,4, and 5 for the procedures governing telecommunications relay service. The contract entered into between Innovative and Hamilton Telephone Company provides that all state and federal laws shall be complied with. Failure to do so by Hamilton would be a breach-of-contract for which Innovative could terminate the agreement with Hamilton and seek such other remedies as may be available by law. Consumers also have the opportunity pursuant to the established rules of the Innovative Telephone to file complaints or petitions concerning the Virgin Islands Relay requesting modifications in the provision of this service or otherwise resolving issues or concerns of the public.

(iii) Where a state program exceeds the mandatory minimum standards contained in §64.604, the state establishes that its program in no way conflicts with federal law.

(2)(iii) Where the TRS service differs from the mandatory minimum standards contained in §64.604, the VRS and/or IP Relay provider establishes that its service does not violate applicable mandatory minimum standards.

As demonstrated in the following section, where the Virgin Islands Relay program exceeds the mandatory minimum standards contained in §64.604, the Virgin Islands Relay establishes that its program in no way conflicts with federal law.

The Virgin Islands Relay does exceed some of the mandatory minimum standards contained in Section 64.604 in terms of the following items:

CA Training and Procedures

The Virgin Islands Relay not only meets, but also exceeds FCC Communication Assistant standards. The Virgin Islands Relay is dedicated to providing high quality relay service - from its hiring and training practices to typing speed and accuracy to in-call replacement of CAs. The Virgin Islands Relay trains its Communication Assistants to relay calls in a manner that not only exceeds FCC standards, but also prepares them to relay calls in a fashion that meets each need of the relay users in the Virgin Islands.

Ability to TYPE at 60 wpm

The Virgin Islands Relay Communication Assistants must TYPE 60 words per minute. The Virgin Islands Relay exceeds this service level by requiring CAs to maintain a 95% accuracy level in addition to 60-wpm typing. The Virgin Islands Center has an average typing speed of 69.08 wpm with 97.24% accuracy.

Turbo Code

The Virgin Islands Relay exceeds the FCC requirement that TRS shall be capable of communicating with ASCII and Baudot formats, at any speed generally in use. The Virgin Islands Relay provides Turbo Code, a proprietary alternate protocol developed by Ultratec, as an enhanced protocol and has secured a license from Ultratec to use this protocol in its relay modems. Virgin Islands Relay users are able to automatically connect “Turbo Code” on every relay call type. With Turbo Code, Virgin Islands Relay users can use their Turbo Code Interrupt feature.

Intrastate Spanish

In addition to Interstate Spanish to Spanish, the Virgin Islands Relay provides Intrastate Spanish to Spanish call handling to the relay users of Virgin Islands and processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

When recruiting and training bilingual CAs, the Virgin Islands Relay requires Spanish CAs to pass a Spanish test, attend a Spanish orientation class and take all standard CA and Speech to Speech training prior to relaying Spanish to Spanish calls. Hamilton macros automatically change to Spanish as needed.

Internet Relay

The provider of the Virgin Islands Relay offers Internet Protocol Relay to end-users. The FCC has allowed the recovery of the costs of Internet Protocol Relay from the Interstate TRS Fund. Hamilton Internet Relay meets all FCC internet relay standards. A description of Hamilton's Internet Relay offering follows:

Hamilton Relay Internet is a 24-hour service that allows computers and other web-based devices to connect to Hamilton Relay via the Internet to call any standard telephone user, VCO user or HCO user. The relay user with a computer or other similar device and access to the Internet goes to Hamilton's relay website at www.hamiltonrelay.com to place a relay call. An Internet connection server is available on the worldwide web to handle Internet relay connection requests. When an Internet connection request is received, it places an entry in the main relay switch queue and is assigned to the first available workstation. The workstation makes an Internet connection to the requesting user and the call is processed just like all other inbound test relay calls. Since there is no way to determine where the Internet call originated from, all Internet relay calls are placed free of charge to the originating user.

Video Relay

The provider of the Virgin Islands Relay offers Video Relay to end-users. The FCC has allowed the recovery of the costs of Video Relay from the Interstate TRS Fund. Hamilton Relay VRS provides maximum user flexibility and ease of operation. Hamilton Relay VRS meets all FCC video relay standards. A description of Hamilton's Video Relay offering follows:

Hamilton Relay VRS gives relay users access to sign language interpreters at the relay center via locations (i.e. homes, offices, etc.) equipped with video conference equipment. Instead of using a telephone and/or TTY, a relay user calls the relay and uses video equipment (i.e. a computer equipped with desktop conferencing software and a camera or a television and appropriate video equipment). An interpreter at the relay center answers the call, and begins to communicate in sign language with the caller. The interpreter asks for the number to be called, or receives it as text from the user, and places the call. The interpreter then begins to relay the call by translating the calling party's sign language into voice for the called party. The relay call is then translated from voice to sign language.

The user reaches the video relay system via the Internet (a web page or IP address) and the equipment at the operator workstation and the video user's equipment will automatically set up for the highest speed at which the two units can mutually operate.

(c)(1) State certification period. State certification shall remain in effect for five years. One year prior to expiration of certification, a state may apply for renewal of its certification by filing documentation as prescribed by paragraphs (a) and (b) of this section.

The Virgin Islands is currently certified to provide intrastate TRS. The Virgin Islands is requesting certification beginning July 26, 2008, continuing for a five-year period.

(d) Method of funding. Except as provided in §64.604, the Commission shall not refuse to certify a state program based solely on the method such state will implement for funding intrastate TRS, but funding mechanisms, if labeled, shall be labeled in a manner that promote national understanding of TRS and do not offend the public.

Please refer to Tab 7 for a description of the Virgin Islands' funding mechanism.

(e)(1) Suspension or revocation of state certification. The Commission may suspend or revoke such certification if, after notice and opportunity for hearing, the Commission determines that such certification is no longer warranted. In a state whose program has been suspended or revoked, the Commission shall take such steps as may be necessary, consistent with this subpart, to ensure continuity of TRS. The Commission may, on its own motion, require a certified state program to submit documentation demonstrating ongoing compliance with the Commission's minimum standards if, for example, the Commission receives evidence that a state program may not be in compliance with the minimum standards.

The Virgin Islands program has never been suspended or revoked and will continue to meet all FCC requirements necessary for certification.

(f) Notification of substantive change. (1) States must notify the Commission of substantive changes in their TRS programs within 60 days of when they occur, and must certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

The Virgin Islands Relay understands and will notify the Commission of substantive changes in its TRS programs within 60 days of when they occur, and will certify that the state TRS program continues to meet federal minimum standards after implementing the substantive change.

By this application the Innovative intends that the operation of the Virgin Islands Relay will continue to be in compliance with the Federal Communication Commission rules and orders regarding telecommunications relay service. If there is any technical or substantial variation discovered by the Federal Communication Commission that would cause or could cause the Virgin Islands Relay to be out of compliance, the Innovative Telephone agrees to take such action as may be reasonably required to bring the Virgin Islands Relay into compliance.

TAB 7

Funding Mechanism for TRS Calling

Intrastate Calling

The Virgin Islands Relay Service receives intrastate funding directly from Innovative Telephone, who recovers the intrastate costs in the rates for local telephone service. There is no separately stated TRS charge for these calls. All intrastate TRS callers are only billed local telephone rates which are the same as all local callers. No intrastate toll charges are applicable in the U.S. Virgin Islands.

Interstate Calling

The Virgin Islands Relay Service recovers the costs of interstate calls originating in the Virgin Islands by billing the federal TRS fund in accordance with Section 64.404(c)(5)(iii) of the Commission's rules.

APPENDIX A

Standard Features

Virgin Islands Relay provides the following features and services, which are listed in alphabetical order to ease the use in locating specific items.

Answering Machine Retrieval (Single-Line)

Virgin Islands Relay provides this service in which messages from a voice or TTY answering machine or a single line telephone are retrieved by the CA. The caller requests Automatic Message Retrieval (AMR) or Single Line Answering Machine (SLAM) and plays the messages to the Communication Assistant by putting the handset near the speaker of the answering machine. The technology used by Virgin Islands Relay records any messages, enabling the Communication Assistant to capture the information and type or voice it back to the relay customer. Once the information is relayed to the caller and the call is completed, the recording is automatically erased when the caller disconnects.

Whenever Virgin Islands Relay has to redial to an answering machine, voice mail, interactive voice messaging unit, or any other type of recording system, for whatever reason, Virgin Islands Relay does so without billing the customer for any subsequent long distance relay calls.

ASCII Split Screen

The relay platform used by Virgin Islands Relay is compatible with ASCII software that makes use of "split screens." Virgin Islands Relay provides a "split screen" for users calling the relay using ASCII. Virgin Islands Relay makes use of split screens for **all** relay calls - the CA's typing is displayed in one window and the relay user's typing is displayed in another window on the monitor of the CA workstation.

Automated Call Routing

During peak traffic periods, the switching equipment used by Virgin Islands Relay automatically routes calls to a workstation located in another relay center to ensure the required levels of service are always met. If one switching system is down for any reason, calls overflow to another switching system.

Automated Number Identification (ANI)

ANI is the telephone number of the originating party. Virgin Islands Relay utilizes ANI technology on all of its incoming relay circuits. The switching equipment used by Virgin Islands Relay recognizes this information and presents it to the CA workstation. ANI is used to determine call jurisdiction.

Automatic Connection Mode

The Automatic Connection Mode feature used by Virgin Islands Relay provides an automatic connection to the relay at the speed of the equipment used by the caller for all callers who have used Virgin Islands Relay's Relay Services at least one time before. The "self-learning" database is updated the first time callers reach Virgin Islands Relay's center with the caller's originating telephone number and the speed or call type at which the user connected to the center i.e. TTY, ASCII or Voice. After the first call, the center's equipment automatically connects at the correct speed the next time it is connected to that particular telephone number.

Average Speed of Answer

Virgin Islands Relay begins measuring Average Answer time from the moment a relay call arrives at its relay switch (i.e. in the TRS center's network). As soon as Virgin Islands Relay's equipment accepts the call from the LEC and the public switched network delivers the call to the TRS center, Virgin Islands Relay starts its call detail record process to capture answer time data. Virgin Islands Relay answers eighty-five percent (85%) of all calls within 10 seconds on a daily basis including abandoned calls. This results in the caller's call immediately being placed, not put in a queue or on hold on a daily basis for the Virgin Islands.

Background Noises

Background noise is anything heard by the CA during a relay call which would normally be known to a hearing person. The TTY user is continually kept informed of what is going on throughout the call. Virgin Islands Relay puts this type of information in parentheses.

Virgin Islands Relay also provides tone of voice information on every relay call.

Carrier of Choice

Virgin Islands Relay has developed a customer profile program based on the relay users' ANI that provides automatic connection to the carrier of choice (AT&T, Sprint, MCI, etc.) for both InterLATA and intraLATA calls made by the relay user in the same manner that voice users have access to preferred carriers.

Cellular/Wireless/PCS Phone Access

This feature allows relay users to access the relay via cellular phones. Virgin Islands Relay's call processing for relay cellular calls ensures that relay users will not experience billing problems. Virgin Islands Relay automatically treats all wireless telephone calls that do not allow direct billing to the ANI as a local call. This prevents the wireless telephone user from having to make alternate billing arrangements.

CA Gender ID

With this feature Virgin Islands Relay macros automatically identify the CA's gender with the TTY greeting.

CA Gender Preferences

Virgin Islands Relay Communication Assistants, when requested, will switch a call to another Communication Assistant who is of the gender requested by the caller and retain that gender for the user throughout the relay call.

CA in-call Replacement

Virgin Islands Relay, as a matter of practice, does not change Communication Assistants during a call. This exceeds the FCC rule that requires a CA to stay with the call for a minimum of 10 minutes or 15 minutes for STS calls. Even at the end of shifts, over lunch hours, and other breaks, Virgin Islands Relay's CAs stay with a call until it is completed. Virgin Islands Relay only substitutes a CA if obscenity is directed to the CA, a perceived conflict of interest exists, or another major emergency exists. A change never takes place until either the calling or called party has completed their part of the conversation (typed or stated GA).

CA Typing Speed

All of Virgin Islands Relay Communication Assistants must type at least 60 words per minute. Virgin Islands Relay subtracts all errors to calculate typing speed. This ensures not only fast typists, but also ACCURATE typists. The average typing speed of Virgin Islands Relay's Communication Assistants is 69.08 wpm with 97.24% accuracy.

Courtesy Messages

Virgin Islands Relay supplies a courtesy message after three rings, to inform callers that they have reached the Relay. Virgin Islands Relay's courtesy message is transmitted in TTY and voice. Virgin Islands Relay's courtesy message follows: "You have reached the relay. Please hold for a CA." If the call has not been answered after 15 seconds, the message repeats as follows, "Please hold for a CA".

Customer Profile Database

The customer profile allows Virgin Islands Relay users to indicate calling preferences. Relay users can add specific information about their call handling preferences to their profile. When a relay user calls the relay, the customer's profile automatically appears on the Communication Assistant's screen. This allows the CA to process the call according to the customer's preferences. To use the customer profile feature, a relay user can contact Virgin Islands Relay via voice, TTY, STS, IP Relay, Video Relay or any other communication mode offered.

Remote Profile Feature

The Remote Profile feature allows relay users to access their profile from any phone or web-based computer, in any location. Remote Profile provides customers with the flexibility to access their profile from any telephone and through any type of relay service, whether traditional relay or Internet Relay. With Remote Profile, relay users simply give their telephone number (or pre-established ten digit number) and PIN number to the CA, which permits the CA to view the customer's pre-selected preferences. This feature is of great benefit to customers who have more than one relay user living in the household. With Remote Profile, each person can establish his/her own profile! For relay users who travel, they are always able to access their profile from anywhere.

Confidentiality of Customer Profiles

Customer profiles are based on ANI (or a pre-established ten digit number). This provides a very high level of security and keeps all confidentiality practices intact. The customer profile database can only be accessed internally (the database resides on site and is part of the relay platform) and a password and PIN system is used to further secure the data. With this password, the relay user can request changes to the profile at any time.

Relay users do not have to use their preset preferences on every relay call. These preferences can be used at the discretion of the relay user on each relay call. Permanent changes to the profile must be made through Customer Service, on-line, via e-mail etc. Once a profile is complete, it takes approximately 72 hours for the profile to be activated. Once activated, the customer profile appears on the CA's screen each time the relay user calls the relay so that the CA can properly process the call.

Preference Options

Customer profile information that a relay user can customize and what is presented to the CA each time the relay user calls the relay is listed below:

- Connection Mode – TTY, Voice, VCO, HCO, ASCII, Spanish, Speech to Speech.
- Carrier of choice for in-state and out-of-state calls.
- Preferred billing options.
- Speed Dialing (can store up to 10 numbers with Speed Dialing).
- Call restrictions (Relay users may restrict certain types of calls such as 900, long distance or international numbers from being placed through the relay. Relay users may also block individual telephone numbers. This feature is similar to the CLASS feature offered by local telephone companies. Relay users can put on their customer profile up to 10 telephone numbers they do not want anyone to call from their telephone line. Even if a CA attempts to call one of the numbers blocked by the relay user via his/her customer profile, the workstation will automatically block that particular telephone number from being dialed out.
- Terminating call information (i.e. no explanation or no identification of relay, customized greetings, etc.)

- Emergency numbers. (Relay users can add local 10 digit emergency numbers to their Speed Dialing list. This feature can save valuable time when time is of the essence. A relay user could simply type call Fire or call 911 and the CA will automatically dial the appropriate PSAP). Virgin Islands Relay encourages relay users to call 911 direct.
- Customer notes section (Virgin Islands Relay includes such things as "slow typing", specific gender of CA and other profile features in its notes section).
- Virgin Islands Relay allows relay users to control all parts of their relay calls. If a caller does not want the CA to identify relay and/or explain relay on all relay calls, the relay user can so state in a profile and Virgin Islands Relay Communication Assistants will not identify relay and/or explain relay on any relay calls. A relay user can also give these instructions at any time during a relay call.
- Virgin Islands Relay allows relay users to totally customize their own greeting. With Virgin Islands Relay's greeting option, relay users can take action to ensure that they will never be hung up on again through the relay. Virgin Islands Relay will announce a caller by name, announce if the caller is hearing or speech disabled if so desired, etc. With Virgin Islands Relay, users can completely personalize their relay service to meet their own needs.
- Relay users can request a translator (a specially trained Communication Assistant who will translate ASL to English and English to simpler English) on every relay call through the customer profile. Relay users may also request translation whenever needed on a per call basis.
- Virgin Islands Relay CAs can see the called party's profile before dialing and can switch between the calling and called parties' profiles as needed.
- Relay users can access their profile from any phone, in any location, by giving their telephone number and pin number to the CA.
- Speech Disabled Indicator. HCO users can indicate in the customized greeting section of their profile that they are speech disabled. For example, when an HCO user places a call to a TTY user, the CA will inform the TTY user that the caller is speech disabled. An indicator will appear in the Notes section of the CA workstation.

Input of Database Information and Changing Preferences

Virgin Islands Relay's provider will transfer all customer profile database information to a new TRS provider at the termination of the contract. Virgin Islands Relay's provider will transfer this data in a usable format within 60 days prior to its last day of service.

Customer Service

Virgin Islands Relay has a separate toll-free number for Customer Service. Virgin Islands Relay's Customer Service is available 24 hours a day to ensure customers have constant access to customer support. Virgin Islands Relay's customer service department is very responsive to the needs of its customers and works to resolve all customer issues in a timely manner. Virgin Islands Relay's Customer Service department instructs relay users on how to place relay calls, answers questions about any changes that have been made, assists relay users with billing questions, performs equipment testing and provides a variety of referral numbers to State Organizations.

Deaf/Blind Pacing

Virgin Islands Relay is familiar with the needs of deaf/blind relay users and provides the following features upon request:

- Virgin Islands Relay CAs will type slower for relay users who request a slower text display speed rate.
- If the user is having difficulty understanding the voice user's language, the relay user may request a translator. The relay user's comments will be translated into English, and the voice user's comments will be translated into simple English.
- Virgin Islands Relay Customer Service is available 24-hours a day to assist relay users with questions, complaints, or problems and to offer free relay information.
- The Virgin Islands Relay website contains several links in which people with combined hearing and vision loss can find helpful information on DeafBlindness and purchasing a TeleBraille.

Dialed Number Verification

Virgin Islands Relay verifies the number to be dialed by voicing it back to the voice user or typing it back to the TTY user (Virgin Islands Relay uses a hotkey to do this so there is no CA intervention). In the same hotkey, Virgin Islands Relay notifies the relay user if they are dialing a local number or toll number. The relay user will see "Dialing Toll (ATT) XXX-XXX-XXXX". Both of these features ensure that the correct number is dialed and gives the relay user an opportunity to notify the CA if the carrier information is correct.

Virgin Islands Relay Communication Assistants verify all pertinent information, including the number to be dialed, names, proper names, account numbers, dollar amounts, etc.

Directory Assistance

This feature gives all relay users access to directory assistance services via the relay. Virgin Islands Relay processes directory assistance requests in the same manner as any other relay requests. Upon receiving the area code from the relay user, the CA dials the correct area code plus 555-1212. When reaching the directory assistance operator, the CA identifies herself/himself and asks for the city and state the user has given while at the same time keeping the relay user informed. When the correct number has been obtained the call is handled as a regular relay call.

The relay user can pick which carrier they want to use for directory assistance. The relay user's carrier of choice will bill for directory assistance calls at their tariffed rate. With presubscription, the customer's carrier performs all billing.

Emergency Assistance

Virgin Islands Relay provides emergency assistance to all relay users. The key to providing the best service in emergency situations is to maintain an updated list of Public Emergency Service Answering Point (PSAP) numbers (i.e. 911 centers). Virgin Islands Relay accomplishes this through two mechanisms to ensure that relay users are connected to the appropriate PSAP: 1) through the use of Intrado's 9-1-1 infrastructure and 2) through the PSAP database maintained by Virgin Islands Relay's provider. Please see Tab 3, Section 4 for detailed information about the emergency assistance Virgin Islands Relay provides.

Enhanced Modems

The modems used by Virgin Islands Relay can auto-detect the difference between ASCII and Baudot signals within the same modem so that each call is connected correctly. These modems support high-speed ASCII connections and have faster ASCII detection capability (3 seconds).

Error Corrections/Abbreviation Expansion

Virgin Islands Relay provides error correction which produces the following benefits – increased typing speed and reduced conversation time. The Spell Checking software used by Virgin Islands Relay checks CA typing/spelling before it is sent to the TTY users. The software automatically corrects any typographical errors of commonly misspelled words. Proper nouns are not affected. Virgin Islands Relay can update the database with new words as needed. Virgin Islands Relay users have seen the benefits as fewer typing errors are seen by the TTY user. This is one more way Virgin Islands Relay continues to bring quality service to its relay customers. The workstation software also automatically expands common abbreviations. This feature allows CAs to use common abbreviations and the word is automatically expanded in the text transmitted. This speeds up the transmission of the call.

Relay users can specifically request to use or not use Spell Check or to expand or not expand abbreviations via Virgin Islands Relay's customer profile. With Virgin Islands Relay, users can customize exactly how they want their relay calls processed.

Hearing Carryover (HCO)

This feature allows relay users to place calls to or receive calls from a hearing-capable caller who is speech disabled permitting the caller to hear the communication directly from the call recipient without such transmission being processed by the CA. The CA then voices any conversation typed by the HCO user to the other party.

Virgin Islands Relay allows HCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of HCO call types are also available through Virgin Islands Relay.

A voice person receiving a call from an HCO user will experience the following:

"This is Virgin Islands Relay CA # _____. with a call from someone who may be speech disabled and uses Hearing Carry Over. Have you received a relay call before?

If the party answers "Yes," The CA will VOICE: "Have you received a Hearing Carry Over call before?"

If the party answers, "Yes," The CA will VOICE: "One moment for your conversation to begin."

If the party answers "No," The CA will VOICE: "The person calling you through the relay uses Hearing Carry Over. The caller can hear you and I will simply read your caller's typed response to you. When I say, "Go Ahead", it is your turn to talk. Please talk directly to your caller and say, "Go Ahead", when you are finished speaking. One moment for your conversation to begin."

HCO-HCO

This service allows two HCO users to contact each other through the relay. Virgin Islands Relay provides HCO to HCO service where the CA voices to both parties, preventing the HCO users from having to read the other party's conversation. This is a great relay enhancement and Virgin Islands Relay is pleased to offer it to relay users.

HCO Permanent Branding

Virgin Islands Relay provides this service through its Customer Profile. Profiled customers who always want to connect HCO are automatically connected to HCO without any CA intervention at the workstation. Once HCO is connected, the Communication Assistant voices "HCO ON" followed by "Virgin Islands Relay CA # ____. Number to call please".

HCO-TTY and TTY-HCO

This feature allows HCO users to contact TTY users (or vice versa) via the relay. The CA will voice the TTY user's typed conversation to the HCO user. The TTY user receives the HCO user's typed conversation directly from the HCO user.

HCO with Privacy

Virgin Islands Relay provides HCO with Privacy upon request which gives privacy for the standard telephone user talking with an HCO user. The CA is not able to hear the hearing person's conversation that goes directly to the speech disabled HCO user. The CA then voices any conversation typed by the HCO user to the other party.

Inbound International

Virgin Islands Relay provides inbound International calling in which the relay user pays to place a call from an International location to the relay center. Virgin Islands Relay then places the

outbound call to a destination in the United States free of charge and relays the conversation for them. Inbound International calls are billed to the Interstate TRS Fund.

Intercept Messages

Virgin Islands Relay's provider provides a system with overflow capability to its other centers. This should eliminate the need for intercept messages. However, if the traffic cannot be rerouted due to multiple circuit failures or for any other reason, the callers will be notified with the appropriate type of intercept messages, which is transmitted in TTY and voice. Minutes of use attributed to accessing intercept messages are not included in the billable minutes.

Internet Protocol (IP) Relay Service

The provider of Virgin Islands Relay offers Internet Protocol Relay to end-users. The FCC has allowed the recovery of the costs of Internet Protocol Relay from the Interstate TRS Fund. Hamilton Internet Relay meets all FCC internet relay standards. A description of Hamilton's Internet Relay offering follows:

Hamilton provides Internet Protocol (IP) relay services from all of its TRS centers.

Hamilton Relay Internet is a 24-hour service that allows computers and other web-based devices to connect to Hamilton Relay via the Internet to call any standard telephone user, VCO user or HCO user. The relay user with a computer or other similar device and access to the Internet goes to Hamilton's relay website at www.hamiltonrelay.com to place a relay call. An Internet connection server is available on the worldwide web to handle Internet relay connection requests. When an Internet connection request is received, it places an entry in the main relay switch queue and is assigned to the first available workstation. The workstation makes an Internet connection to the requesting user and the call is processed just like all other inbound test relay calls. Since there is no way to determine where the Internet call originated from, all Internet relay calls are placed free of charge to the originating user.

Because Hamilton is providing Internet Relay service off its existing relay platform, Hamilton has access to all its current billing and reporting systems. Hamilton can provide the same statistical information on Internet Relay calls, as it does for all other relay calls.

Confidentiality of Internet Transmission

All calls handled by Hamilton Relay Internet are kept strictly confidential. By law, no relay employee can share ANY information from a relay conversation. Hamilton keeps NO records, documents or recordings of any relay conversation.

Hamilton's Provision of FCC Waived Services

- Hamilton is able to provide 2-Line VCO and 2-Line HCO through InspireChat. The only difference is that the individual uses his/her computer instead of his/her TTY.
- Speed dialing is available through a customer profile option on InspireChat.

- Hamilton is able to provide three-way calling if the relay user conferences in another party, i.e. the voice user is able to tie the third party directly into the conversation or by making a second call to the relay center.

Internet Relay Through Instant Messaging

Hamilton Relay is accessible through AOL® Instant Messenger™ (AIM®) service. This service allows deaf, hard of hearing and speech-disabled AIM® users to connect to Hamilton Relay to place relay telephone calls directly from their AIM® Buddy List® feature.

To access Hamilton Relay through AIM®, users simply add Hamilton's designated screen name to their AIM® Buddy List® feature and send an instant message to Hamilton's screen name (ThatsHamilton) with the ten-digit phone number they would like to call. Once connected with a Communication Assistant, the call proceeds as a traditional relay call, except using instant messages instead of typing text into a TTY device. AIM® is not on a secure connection. See further in this Attachment for more information regarding the capabilities of Hamilton Wireless Relay.

Wireless Internet Relay with Mobile Devices

Hamilton Relay Wireless is a service that enables Deaf and Hard of Hearing relay users to place Internet Relay calls using pagers, PDAs, cell phones and other mobile devices. Instead of typing phone conversations on a Text Telephone (TTY), relay users can use any mobile device that has a wireless web browser (also called a Wireless Access Protocol (WAP) browser or any mobile device or computer that runs AOL® Instant Messenger™ (AIM®) to make a relay call through Hamilton. Relay users can use this service to call any one any where in the United States, 24 hours a day, 7 days a week. A Hamilton Communication Assistant answers the call and then places another call to the telephone number the person wishes to reach. The Communication Assistant then translates and relays conversations confidentially by converting voice information to typed communication and reading aloud typed messages to hearing persons.

Internet Relay Call Back

Hamilton provides Internet Relay Call Back through the use of AIM® and also through the use of a wireless web browser.

In order to receive a wireless relay call using a wireless web browser and make use of Internet Relay Call Back, relay users simply instruct voice users to call 888-889-9872 and give the CA his/her pager's email address. The CA then sends an email to the user's pager and waits for the customer to answer his/her mobile device. Once connected, the conversation begins. If the wireless user is not available or on-line, he/she will automatically receive email when he/she signs on.

In order to receive a wireless relay call using AIM® and make use of Internet Relay Call Back, relay users need to call Hamilton Relay Customer Service to authenticate his/her AIM® Screen Name with Hamilton Relay. Voice users will call 888-889-9872 and give the CA the

authenticated screen name or pager number. The CA then contacts the AIM® user by sending an email AND an instant message to him/her. To answer the call, the user simply responds to the instant message and the conversation begins! If the AIM® user is not available or on-line, he/she will automatically receive the email and instant message when he/she signs on.

Procedures/Technology Used to Reduce Internet Relay Fraud

Hamilton blocks all international IP addresses as required by the FCC. Hamilton also performs daily monitoring of call patterns that may be indicative of international activity. Based on the results of these call patterns, Hamilton will block those IP addresses from placing calls.

In addition, Hamilton distributes the following information to individuals that call Customer Service for information regarding fraudulent calls being made through relay:

Please continue to do business with customers with who are deaf, hard of hearing or speech disabled.

Relay calls offer your business new opportunities.

Accepting calls from relay users could result in increased business for your company. Let Hamilton Relay assist your company in understanding how the use of relay may greatly benefit your business. Accepting relay calls makes your products and services available to Americans with hearing loss or speech disabilities. Remember, these are customers who call through the relay. Americans with hearing loss or speech disabilities have literally billions of dollars to spend annually: Let them spend it with your business. Don't hang up on them. Stay on the line when you hear: "This is Hamilton Relay Internet with a call…"

What is Relay?

Telecommunications Relay Service, also called TRS or Relay, allows people who have a hearing loss or speech disability to communicate over the telephone with standard telephone users. Individuals with hearing or speech difficulties use the Internet or a Text Telephone (TTY) or other assistive telecommunications device to call a telecommunications relay center. A Communication Assistant answers the call and then places another call to the telephone number the person wishes to reach. The Communication Assistant then translates and relays conversations confidentially by converting voice information to typed communication and reading aloud typed messages to hearing persons.

Fraud Busters

You may have heard that fraudulent calls are being placed to businesses through the use of Internet Relay. Scam artists are using the service to defraud merchants in cities across the country. These overseas scam artists, posing as a deaf or hard of hearing person, try to purchase large orders of merchandise from American companies.

This is a problem across the country and the relay industry continues to work on finding solutions to this issue. Hamilton has put security measures in place in an effort to make sure that our service is only being used by those who need it – deaf, hard of hearing or speech disabled

people.

Don't be reluctant to accept relay calls. Following is a list of tips you can use to ensure that the calls you take are legitimate –and to avoid getting scammed.
Hamilton appreciates and shares the concern of the business about the use of the relay to conduct fraudulent activities. The same steps should be taken to avoid this type of fraud as are taken in any circumstance in which the customer is not physically present. Hamilton offers these tips to businesses:

Be suspicious if:

- A caller orders large quantities of products.
- A caller asks to have the merchandise shipped immediately – especially to an International location.
- A caller tries to use multiple credit card numbers. For instance, if the initial credit card number is declined by the bank and the customer offers an alternative number.

Hamilton Relay suggests that businesses take the following steps to protect themselves:

- Always ask the caller for identifying information about the account such as a card verification code.
- Always ask for the caller's full name, address and telephone number.
- Ensure that the caller is authorized to use the card.
- Always ask the caller for the name of the issuing bank and its toll-free customer service number as printed on the back of all credit cards.
- Tell the caller that you will check with the bank and call them back. If the caller objects, explain that these procedures are also for their protection.
- If the caller still objects to providing any of the above information, end the conversation.
- If the caller wishes to pay with a certified check, wait until the funds are in your bank account before shipping the merchandise.

The Federal Trade Commission (FTC) has instructed that person who have been defrauded should contact the FTC directly at www.ftc.gov or 877-FTC-HELP.

To read the FCC's statement online:

1. Go to www.fcc.gov
2. Under "Consumer Center" in the left column, click on "Disability Issues".
3. Scroll down to the document titled "6-18-2004 FCC Reminds Public of Requirements Regarding Internet Relay Service and Issues Alert".

Last Number Redial

Virgin Islands Relay is providing last number redial within the duration of the same inbound call.

LEC Calling Services

- **True Caller ID**
  Virgin Islands Relay provides true Caller ID service where the actual information of the calling party (not the relay center number) appears on the Caller ID box. Virgin Islands Relay provides this information on all call types and on all carriers. Virgin Islands Relay passes, sends and receives calling line identification information, including blocking information from all users calling through the relay service.

- **CID Per Line (Global) Block / CID Per Call Block**
  Calling line information is provisioned on the relay customer's line by the LEC. All forms of Caller ID Blocking (Global or per call blocking) pass through on a per call basis with no relay intervention. Because Virgin Islands Relay makes use of true SS7 technology, rather than ISDN, all forms of calling line identification information and blocking features purchased by the LEC are passed through with no relay intervention.

  Because Virgin Islands Relay can pass, send and receive calling line identification information, a whole host of other features are available including:

- **Call Screening (Call Rejection) (Call Block)**
  Call Screening is provisioned on the relay customer's line by the LEC in order to prevent nuisance or unwanted calls. The relay user will simply program his phone to block all calls from his selected list of phone numbers. If someone calls through relay from one of these numbers on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from other numbers are not blocked.

- **Call Acceptance**
  Call Acceptance is provisioned on the relay customer's line by the LEC. Call Acceptance lets a relay user block all calls except those from his list of special phone numbers. A relay user can add, delete or change numbers on his list at any time. This feature is often used in order to prevent nuisance and solicitation calls. If someone calls through relay from a number not on the list, the caller receives a pre-recorded announcement stating the caller is not accepting calls at this time, which the relay will type or voice to the originating caller. Calls from numbers not on the list are blocked.

- **Anonymous Call Rejection**
  Anonymous Call Rejection is provisioned on the relay customer's line by the LEC in order to prevent receiving calls that are "blocked" or "private." Relay users who do not want to receive calls from parties who have blocked their Caller ID information can make use of this feature. Callers who have blocked their Caller ID information will receive a recording

indicating that the called party is not accepting calls at this time which the Communication Assistant will either voice or type to the originating caller.

- **Preferred Call Forwarding**
  Preferred Call Forwarding is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers that they wish to forward to a new telephone number. All other callers do not forward to the new telephone number. Relay users can add, delete, or change numbers on their call forwarding list.

- **Unique Flash**
  Unique Flash is provisioned on the relay customer's line by the LEC. Relay users create a list of numbers with their own distinctive flash (ring). If someone calls through relay that is calling from a number with a distinctive flash associated with it, the called relay party will hear or see the distinctive flash. The unique flash indicates it's one of the special callers from the individual's list.

- **Call Forwarding**
  Call Forwarding can be provisioned on the relay customer's line by the LEC; for example, if the user puts his telephone on call forwarding the relay call will be automatically forwarded to the new location.

Local/Extended Area Service

Virgin Islands Relay's provider has obtained the necessary information (NPA/NXX) from all Virgin Island LECs to build a database to identify intrastate calls. This database notifies the CA if the call being placed is a local call. If it is a local call, no billing arrangements are necessary and the call is recorded to calculate session minutes only.

Machine Recording Capabilities

Virgin Islands Relay has implemented a recording function that allows the Communication Assistant to record a voice announcement and then play back the message at a speed controlled by the Communication Assistant. The CA informs the relay user through the use of macro that a recording has been reached, followed by another macro stating, "GATHERING INFO PLS HOLD". The message is retained for the length of the call. This prevents the caller from having to call back several times to get the entire message. Once the originator of the call disconnects, the recording is automatically deleted from the system. Keys on the keyboard are used to control the speed of the recording. This makes the recording function very easy for Communication Assistants to use.

Pagers

Virgin Islands Relay handles relay calls that involve pagers and beepers. There is no difference in Virgin Islands Relay call processing for text initiated calls made through pagers.

Regional 800/888/877

Virgin Islands Relay allows access to restricted 800 numbers and other special prefixes. This is provided through an incumbent LEC. Virgin Islands Relay ensures that all relay users have access to all regional 800 numbers and other special prefixes.

Regionally Directed Toll-Free Numbers

Virgin Islands Relay allows access to regionally directed toll-free numbers. Because Virgin Islands Relay passes true Caller ID information, the caller's ANI reflects a Virgin Island number which results in the call being routed to the correct state or regional location.

Reverse Two-Line HCO

Virgin Islands Relay's Two-line HCO feature also works in the reverse when a voice user places a call to a two-line HCO user through relay. It is then called Reverse Two-line HCO.

Reverse Two-Line VCO

Virgin Islands Relay's Two-line VCO feature also works in the reverse when a voice user places a call to a two-line VCO user through relay. It is then called Reverse Two-line VCO.

Spanish

Virgin Islands Relay provides Intrastate and Interstate Spanish to Spanish service via a dedicated toll-free number. Relay users can select "Spanish" as an option on the Customer Profile. This information is presented to the CAs at the workstation for proper call processing. Virgin Islands Relay processes all the same call types on its Spanish lines as it does on its English voice and TTY lines.

Spanish to English Call Translation

Virgin Islands Relay provides Intrastate Spanish to English, and English to Spanish call handling.

Speech Disabled Indicator

HCO users can indicate in the customized greeting section of their profile that they are speech disabled. For example, when an HCO user places a call to a TTY user, the CA will inform the TTY user that the caller is speech disabled. An indicator will appear in the Notes section of the CA workstation. CAs will uniformly recognize an "s" typed by a TTY user at the beginning of a call to indicate that the caller is speech disabled.

Speech to Speech

STS service allows individuals with a speech disability to use his/her own voice or a speech synthesizer when using the relay. Specially trained CAs process Speech to Speech calls. Virgin Islands Relay gives STS users access to the same profile and all of the features contained within that profile which are currently available to other relay users.

Speech to Speech/Spanish

STS service is also available in Spanish. Relay user's can select "Spanish" and "STS" as on option on the Customer Profile.

Speech to Speech/VCO

STS/VCO is designed for people who are hard of hearing or Deaf and have a speech disability. The relay user can make or receive phone calls through the relay through a Speech to Speech CA using his/her own voice or voice synthesizer and read everything said by the voice caller on a TTY or VCO telephone.

STS to other TRS Communication Modes

Virgin Islands Relay also allows STS users to place calls to people, who use a TTY, or other TRS-communication modes such as VCO, HCO, or to another person with a speech disability. Speech to Speech can be used a variety of ways:

- Two hearing individuals, with the CA repeating the words of the person with the speech disability.
- Two individuals with speech disabilities with the CA repeating both person's words.
- A VCO user and a hearing person, with the CA repeating the words of the VCO user if the hearing person does not understand the user's speech and with the CA typing what is said by the hearing person to the VCO user.
- A TTY user and a person with a speech disability without a TTY, with the CA typing the words of the person with the speech disability to the TTY user.
- Hearing Carry Over with the person with a speech disability typing what they would like to say and the Communication Assistant voicing it to the hearing user.
- Hearing Carry Over in combination with Speech to Speech.

Toll Discounts

Virgin Islands Relay's Customer Service Representatives discuss carrier of choice with relay users and direct them to other telephone numbers to access more information from particular carriers. Virgin Islands Relay maintains a list of participating long distance carriers and telephone numbers and helps the customer shop for the best toll discounts through relay that match their calling style.

Transfer Gate Capabilities

If a relay user calls the TTY relay access number and requests another service (such as STS, Spanish, etc.), Virgin Islands Relay has the ability to transfer the call to the appropriate workstation for call processing.

TTY Operator Services (OSD)

Virgin Islands Relay provides to relay users wanting to place a TTY to TTY operator assisted call the 800 numbers to those long distance companies providing operator services for the Deaf. The relay will dial the selected number for the customer and release the call if a TTY to TTY call. Otherwise, relay will process the call as normal. Virgin Islands Relay gives relay users access to all operator services, to the same extent that such access is provided to voice users. Operator services for relay calls are processed by Virgin Islands Relay with the customer's carrier of choice. The cost to the end user is billed by the customer's carrier.

TTY to TTY (Call Release)

Virgin Islands Relay processes TTY to TTY calls when it is necessary to go through a voice switchboard first, or if the originating TTY user is using a calling card that is accessed by calling an 800 number first. Once the CA reaches a compatible TTY user when placing a relay call, Virgin Islands Relay gives the calling party the option to communicate independent of the relay function. If the calling party agrees to do so, the CA will drop out of the call. If the call is a long distance call, the call will be billed as a normal relay call (i.e. the relay user's carrier of choice).

Virgin Islands Relay provides a true call release function to satisfy the FCC requirement which removes the workstation from the call.

Turbo Code

Virgin Islands Relay provides Turbo Code, which is a proprietary alternate protocol developed by Ultratec that is faster than Baudot (Turbo Code is similar to "real-time") and does not have the limitation of ASCII. Turbo Code allows for "interrupt" capability while one party is still typing. The modems used by Virgin Islands Relay auto-detect the end-user's equipment for Turbo Code. If Turbo Code is found, Virgin Islands Relay automatically connects in "Turbo Code" to the relay user. Virgin Islands relay users are able to automatically connect "Turbo Code" on every relay call type. With Turbo Code, Virgin Islands Relay users can use their Turbo Code Interrupt feature and the CA will acknowledge the interrupt.

Two-Line HCO

Virgin Islands Relay also provides two-line HCO capability. To place a two-line HCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the relay user conferences in the third party via the voice line (the party they

want to speak with). Now, the CA only voices what the HCO user types. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Two-Line HCO/Speech to Speech

This option works the same as a 2-Line HCO call, but is processed by a specially trained STS CA. The 2-Line/STS user can choose between voicing their own conversation or having the CA voice the conversation for them. If the HCO user chooses to voice his/her conversation and becomes tired or is having difficulty being understood, he/she can type his/her part of the conversation and call on the CA to "re-voice" as needed. The HCO user can switch between voice and typing at any time during the call.

Two-Line VCO

Virgin Islands Relay provides two-line **VCO** capability which allows a VCO user to have a more interactive conversation. By using two telephone lines, the caller can listen to their conversation if they have some hearing available, on one line while receiving typed text from a CA on the other line, thus creating a more natural flow of conversation.

To place a two-line VCO call, the ASCII/TTY user calls relay, connects with a CA and requests that the CA make a call to their voice (second) line. The relay user must have two telephone lines and 3-way calling. Once connected in voice, the customer conferences in the third party (the party they want to speak with). Now, the CA only types what the third party says. The CA is virtually invisible to the voice customer, allowing for a two-way uninterrupted conversation to take place.

Variable Time Stamp Macro

The automated workstations used by Virgin Islands Relay begin measuring time the moment the originating party connects to the relay and continues measuring time until the originating party disconnects. These workstations also measure the length of each individual call the originating party has made while connected to that workstation. Virgin Islands Relay will notify the TTY user when the called party has disconnected and indicate the time of disconnection. Virgin Islands Relay will automatically capture the time a voice user disconnects and include this time in the macro used to notify the text party that the other party has disconnected, i.e. PERSON HUNG UP AT 16:34 CST GA. This information is available to relay users upon request.

Video Relay Service

The provider of Virgin Islands Relay offers Video Relay to end-users. The FCC has allowed the recovery of the costs of Video Relay from the Interstate TRS Fund. Hamilton Relay VRS provides maximum user flexibility and ease of operation. Hamilton Relay VRS meets all FCC video relay standards. A description of Hamilton's Video Relay offering follows:

In compliance with FCC requirements, Hamilton Relay offers 24/7 VRS operability. VRS users nationwide can access Hamilton Relay VRS 24 hours a day, 7 days a week, 365 days a year including holidays. Hamilton Relay expanded its hours of operation well in advance of the FCC's January 1, 2006 deadline.

The FCC also requires VRS providers to answer 80 percent of all VRS calls within 120 seconds by January 1, 2007. Hamilton is in compliance with the FCC's requirement as it relates to ASA and reports this information to NECA. Hamilton measures ASA for VRS using the same method as it does for traditional relay minutes.

Hamilton subcontracts the labor management associated with VRS to Birnbaum Interpreting Services and currently provides VRS from three centers in the locations listed below.

8555 16th Street, Suite 300
Silver Spring, MD

9107 Bluebonnet Centre Blvd.
Baton Rouge, LA

8383 Greenway Blvd., Suite 90
Middleton, WI

Hamilton Relay VRS gives relay users access to sign language interpreters at the relay center via locations (i.e. homes, offices, etc.) equipped with video conference equipment. Instead of using a telephone and/or TTY, a relay user calls the relay with video equipment (i.e. a computer equipped with desktop conferencing software and a camera, videophone, or a television and appropriate video equipment). An interpreter at the relay center answers the call, and begins to communicate in sign language with the caller. The interpreter asks for the number to be called, or receives it as text from the user, and places the call. The interpreter will then begin to relay the call by translating the calling party's sign language into voice for the called party. The relay call is then translated from voice to sign language.

The user reaches the video relay system via the Internet (a web page or IP address) and the equipment at the operator workstation and the video user's equipment automatically set up for the highest speed at which the two units can mutually operate.

All interpreters used by Hamilton to perform Video Relay Services are qualified in their ability to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. All interpreters are proficient in ASL, Signed English, and PSE, both receptive and expressive and oral interpreting. Specifically, Hamilton will only use sign language interpreters to perform Video Relay Services who strictly adhere to a professional "Code of Ethics" developed and supported by the Registry of Interpreters for the Deaf, Inc. (RID) along with representation from the Deaf Community. All interpreters will adhere to the RID Code of Ethics and the same pledge of confidentiality all CAs must follow.

Hamilton Relay VRS is available at www.hamiltonrelay.com or at HamiltonVRS.tv from an H.323 device. Relay users who have high speed Internet access and video equipment, are able to

enjoy the ease of use, quality and confidentiality of Hamilton Relay AND the award winning qualities of BIS interpreters with Hamilton Relay VRS!

With Hamilton Relay VRS, the relay user is in charge – creating a customized video relay environment and conversation that fit each individual perfectly:

- Customers can customize their video calls by giving the CA specific instructions on a per call basis (i.e. no explanation or no identification of relay, customized greetings, etc.). By customizing their own greetings, relay users can take action to ensure that they will never be hung up on again through the relay. With Hamilton Relay VRS, customers can completely personalize their relay service to meet their own needs.

- Customers can customize their calls using their "Customer Profile". Hamilton Relay VRS allows customers to completely personalize their relay service their way. With the Hamilton Relay VRS Customer Profile, the customers' instructions for the CA and their calling preferences will be followed on every call!

- Customers choose the type of equipment to use with Hamilton Relay VRS. Customers can use a PC together with a web cam and NetMeeting or similar software OR they can use The D-Link DVC-1000 i2eye™ VideoPhone, the Sorenson VP-100 VideoPhone, or other similar H.323 compatible devices. Since the DVC-1000 i2Eye™ and the Sorenson VP-100 VideoPhones are stand-alone devices, customers do not need a computer to videoconference over the Internet, but do need a television and high speed Internet access.

- ASL or English:
  Customers choose the method to have their conversation relayed. Because of the quality of our Interpreters & Transliterators, individuals can have their conversation interpreted in ASL, English or somewhere in between. If the customer chooses English, the Interpreter/Transliterator will transliterate their call using "sign supported speech" (signing conceptually accurate in English word order and English on the lips). This allows the individual to lip-read or speech-read their conversation while simultaneously reading the signs. This is a great feature, allowing CUSTOMERS to choose the best communication style to meet their needs! If customers choose ASL their call will be interpreted.

- Voice users can call relay users with Hamilton Relay VRS. The voice user will call the relay center at 866-498-4777 and will give the Interpreter the relay user's IP address or User Name. If the voice user gives the interpreter the relay user's User Name as a way to call them, the relay user must be logged-on to the internet and the Hamilton Relay VRS web site to receive a call from a voice user.

- VRS Customers can make VCO calls through Hamilton Relay VRS. To make a VCO call through Hamilton Relay VRS, the relay user selects the VCO option and uses a headset (or microphone connected to his computer) to give the Interpreter the number to call. During a VCO Hamilton Relay VRS call, the relay user speaks directly to the person he is calling. When that person responds, the relay user (if they have some degree of hearing) will be able to hear the caller's voice, while simultaneously reading the Hamilton Relay VRS Interpreter on his screen. The Hamilton Relay VRS Interpreter completes the call without calling the

relay user's telephone line and making a 2-Line VCO call. If the quality of the connection is poor with the headset or microphone, the Hamilton Relay VRS Interpreter will offer the 2-Line VCO method, in which the Interpreter will dial the relay user's voice telephone number.

Video Mail and Missed Calls

Similar to telephone voice mail, Video Mail allows a caller to leave a video message when the person they are calling is not available. The recipient of Video Mail then receives an e-mail containing the video message as a QuickTime attachment. In the same fashion, if a caller chooses not to leave Video Mail, a Missed Calls notification e-mail is sent providing the number of the person that attempted to call.

Transmission Bandwidth

Hamilton's Video Relay System is H.323 compliant. Hamilton's video quality and clarity is more than sufficient to make signing understandable. Bandwidth transmission is available well beyond 384 KBPS for any Video Relay user. Hamilton's system automatically connects at the highest speed allowable by the video relay user's equipment.

Confidentiality of Calls

All calls handled by Hamilton Relay VRS are kept strictly confidential. By law, no relay employee can share ANY information from a relay conversation. There are NO records, documents or recordings of any relay conversation.

Hamilton's Provision of FCC Waived Services

- Hamilton has made voice-initiated VCO and HCO services available through its video relay. As long as the VRS user has a headset or microphone and speaker, an end to end voice path is automatically created from the video user to the voice user. No additional action is required on the part of the VRS interpreter. Unlike traditional VCO and HCO, there is no need to wait for a GA. The video user can voice or listen as much or as little as they like, and the interpreter will do the rest. If the quality of the connection is poor with the headset or microphone, the VRS Interpreter offers the 2-Line VCO or HCO method, in which the Interpreter dials the relay user's voice telephone number.
- Speed dialing is available through a customer profile option on Hamilton's video relay service.
- Hamilton is able to provide three-way calling if the relay user conferences in another party, i.e. the voice user is able to tie the third party directly into the conversation or by making a second call to the relay center.

Voice Call Progression

Virgin Islands Relay provides this service in which voice or HCO relay users or Speech to Speech users hear everything on the line as the relay call is being set up by the Communication Assistant.

Voice Carryover (VCO)

Voice Carryover (VCO) provides relay users with the ability to call to or receive a call from a voice-capable caller who is hearing-disabled permitting the caller to speak his or her own message directly to a call recipient who is hearing-capable without such transmission being processed by the CA. The CA then types any conversation spoken to the VCO user so it can be read on the TTY. Virgin Islands Relay allows relay users to request VCO services without the normal TTY transmission that is typically required. A VCO user can connect voice and say "VCO" and Virgin Islands Relay connects the call. Voice users do not hear tones during a VCO call.

Virgin Islands Relay allows VCO users to utilize both TTY modes, acoustic mode and direct connect mode. A variety of VCO call types are also available through Virgin Islands Relay.

The following is a comprehensive description of the method used to achieve this type of service.

A voice person receiving a call from a VCO user will experience the following:

"This is Virgin Islands Relay CA # _____. with a call from someone who may be deaf or hard of hearing and uses Voice Carry Over. Have you received a relay call before?"

At the same time, the CA will type to the VCO user the terminator's greeting and gender (i.e. HELLO (M).

If the voice party answers "Yes," The CA will VOICE: "Have you received a Voice Carry Over call before?"

If the party answers "Yes," The CA will VOICE: "One moment for your conversation to begin."

If the party answers "No," the CA will send a macro (EXPLAINING RELAY) to the VCO user and will voice: "The person calling you through the relay uses Voice Carry Over. You will hear the person speaking directly to you. When the caller says, "Go Ahead", it is your turn to talk. Then I will simply type everything I hear on your end of the line, so please talk slowly and directly to your caller. Please say "Go Ahead" when you are finished speaking. One moment and you will hear your caller's voice."

VCO Greeting Identifier

Virgin Islands Relay CAs inform VCO users that VCO is on by sending a macro that states (VCO ON GA).

VCO-HCO and HCO-VCO

Virgin Islands Relay provides this service to VCO and HCO users who call another HCO or VCO user through the relay. The VCO user voices his/her conversation directly to the HCO user. The HCO user's typing goes directly to the VCO user.

VCO Permanent Branding

Virgin Islands Relay provides this service through its customer profile. Profiled customers or customers who dial the dedicated VCO toll free number directly will be automatically connected to VCO without any CA intervention at the workstation. Once VCO is connected, the Communication Assistant sends the "VCO ON" hot key followed by another hot key "VIR CA XXXXF NBR PLS GA".

VCO-TTY and TTY-VCO

Virgin Islands Relay provides this service in which VCO users can call a TTY user (or vice versa) through the relay. The VCO user voices his/her conversation which the CA types to the TTY user. The TTY user types his/her conversation directly to the VCO user.

In addition, Virgin Islands Relay provides VCO to TTY or ASCII services as well as all other combination of call types involving VCO.

VCO-VCO

This service allows two VCO users to contact each other through the relay. Virgin Islands Relay provides VCO to VCO service where the CA types to both parties, preventing the VCO users from having to type their part of the conversation.

VCO with Privacy

Virgin Islands Relay will provide VCO with Privacy upon request in which the CA will not hear the caller speaking through the relay, and will only type voiced responses back to the VCO user.

Voice Gender ID

Virgin Islands Relay CAs indicate to the TTY user the gender of the non-TTY relay user at the beginning of the call – (M) Male, (F) Female, or (Child) Child. If the CA is absolutely not sure, the CA will type (?).

Virgin Islands Relay CAs also indicate to the TTY user when another voice person has become involved in the call. Virgin Islands Relay identifies the gender of the new party involved in the call immediately.

Voice to Voice Call Release

Virgin Islands Relay provides Voice to Voice call release which allows a hearing user to connect to another hearing user via the Relay. This happening is usually inadvertent. Rather than blocking the call, this feature allows the CA to be "released" from the telephone line without triggering a disconnection between two hearing users. The CA releases the call after the CA connects the originating hearing caller to the hearing called party.

Once the CA hears the two hearing parties are able to communicate with each other, the CA states, "CA HERE YOU MAY BEGIN YOUR CONVERSATION NOW".

The CA receives an automated message box with instructions to release the call from the workstation. Once the call has been released from the workstation, the CA is able to take other incoming calls.

Using the above procedure, Virgin Islands Relay provides a voice to voice call release function, which removes the workstation from the call. If the call is a long distance call, the call is billed as a normal relay call (i.e. the relay user's carrier of choice).

1010 Numbers

Virgin Islands Relay offers 1010 dialing through the relay. This service is functionally equivalent to using 1010 services when not placing calls through the relay.

7-1-1

All services available from Virgin Islands Relay are accessible through 711 including Speech to Speech. Virgin Islands Relay meets all the same general requirements set forth for all relay calls when 711 is dialed rather than an 800 number.

900/800 Pay Per Call

Virgin Islands Relay allows relay users to access intrastate and interstate 800, 900 and 976 pay-per-call services in which the company providing the service bills the end-user directly.

A relay user simply calls the TTY relay number and gives the 800, 900 or 976 number to the CA. The CA places the call as usual and begins relaying the call. **On all 900 or 976 numbers, Virgin Islands Relay CAs type the dollar amount per minute associated with the call to the TTY user and ask them if they want to continue the call before charges begin.** The calling party is billed for the call by the 900-service provider or the carrier, whichever is appropriate. Through the use of the Customer Profile, relay users may restrict pay-per-call services from being placed from their telephone line.

ADDITIONAL FEATURES

1. Virgin Islands Relay CAs always follow the relay users' instructions. This includes instructions in the profile, specific instructions given on any individual relay call, etc. For example, if a relay user instructs the CA not to type a recorded message and identifies the option he wishes to reach by number, the CA will bypass the recording and go directly to the option indicated. This dramatically increases the speed of call processing for the relay user.

2. Virgin Islands Relay has the ability to place the following call types:

Bill to ANI	Person to Person
Third Party	PP - Bill to ANI
Collect	PP – Third Party
Calling Card/Credit Card	PP – Collect
Prepaid Calling Cards	PP – Calling Card/Credit Card

3. Virgin Islands Relay users wanting to dial 711 can still make use of their customer profile.

4. If the called party is disconnected by the CA or technical error, the CA will redial the called party at no charge to the customer.

5. If a relay user requests the CA to give the correct relay number during the conversation, Virgin Islands Relay CAs will give the number as requested.

6. Virgin Islands Relay CAs give relay users who want another state's relay number the correct information.

7. If so desired by the relay user, Virgin Islands Relay has the ability to work with regular telephone operators to interrupt another telephone line or to check a line for conversation.

8. Virgin Islands Relay allows the relay user to control all aspects of the calls. In addition, Virgin Islands Relay puts no restrictions on the number or duration of calls placed. Relay users are also able to request a specific CA gender.

9. Virgin Islands Relay meets all FCC blockage and answer time standards.

10. Virgin Islands Relay is able to accommodate any level of growth.

Following in this Appendix, Virgin Islands Relay has included sample materials including its Customer Profile, Guide to Understanding Your Customer Profile and a tip sheet designed to assist relay users with choosing a long distance carrier to match their calling styles.

Virgin Islands Relay Customer Profile Application

1. Customer Information

Phone Number _____ - _____ - _____ E-mail Address _____

First & Last Name _____

Address _____

City _____ State _____ Zip _____

Check here if you want to be on the VIRS Mailing List.

2. Password + PIN

To make sure you are the only person who can make changes to your Profile, you should pick a "password" (secret word). Pick 4 to 10 letters and /or numbers. You also need to pick a "PIN" (secret number) to allow the CA to view your Profile when you make Internet Relay calls or when you use Remote Profile. Pick 4 numbers.

Password: _____ Pin: (pick 4 numbers)_____

3. Making Relay Calls (check one) Every time I CALL Relay, I use …

If you live with a person who calls relay differently than you, contact Customer Service.

Section 3 does not apply when making calls using Hamilton Relay Internet.

Language Type:	English	Spanish

VCO Phone w/ keyboard w/out keyboard	2 Line VCO w/ ASCII w/ Turbo Code	TTY	2 Line HCO	Voice only user: 711 800#
		ASCII	Speech to Speech	
		HCO		

Answering Relay Calls (check one) When I ANSWER a Relay call, I use….

If you live with a person who answers relay differently than you, skip this part.

TTY *(VCO users with a TTY answering machine should mark TTY)*	VCO w/ keyboard w/out keyboard	Voice	Speech to Speech
		HCO	Spanish
		ASCII	

4. Long Distance Company–Check only one

If you leave this section blank, your bill will come from AT&T*

Section 4 does not apply when making calls using Hamilton Relay Internet.

Please choose your long distance telephone company from the list provided.
My long distance company is:

_____

If you do not see your long distance telephone company on the list please provide the company name and the customer service number for the company.

5. For every relay call I make, I want….

Check the service you want with EVERY relay call you make.

Translator – *Translate ASL to English*	**Spell Check Off**
Slow Typing – *CA will type slowly*	**No Abbreviations**

6. Speed Dialing

When using Speed Dialing through Hamilton Relay Internet, leave the "Number you are Calling" box blank.

Name	Phone Number
1.	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10.	

7. Greetings

You can customize how the CAs identify relay to the person you are calling if so desired:

I want CAs to say my first name to the people I call. Name: _____

Example: *"This is Virgin Islands Relay CA 4444 with a call from Bob. Are you familiar with the relay?"*

I want CAs to tell the people I call I am:

Deaf	Hard of Hearing	Speech Disabled	Deaf/Blind

Example: *"This is Virgin Islands Relay CA 4444 with a call from someone who is deaf. Are you familiar with the relay?"*

(NE) Never explain how to use the relay to any person I call.

(NI) Never identify the relay to any person I call. (requires "My Hello")

My Hello (50 Characters including spaces): *CAs will always greet the people you call this way:*

_____

_____

Example: Hi, Bob here How are you?

8. Restrictions

Select the types of calls that you do not want made from your telephone. If you check any on this list, you will not be able to make those types of calls through the relay. Please note long distance and directory assistance calls are free with Hamilton Relay Internet.

Long Distance	900/976	International	Directory Assistance	Operator Assistance

When completed please return to:
VIRS Customer Service. PO Box 285, Aurora, NE 68818
Fax 402-694-5110
Customer Service 866-833-4038 TTY/Voice

Virgin Islands Relay Service Guide for Understanding Your Customer Profile

Hamilton Relay has developed a Remote Profile feature, which allows you to access your customer profile from any phone or web-based computer, in any location. With Remote Profile, simply give your telephone number (or pre-established ten digit number) and PIN number to the CA. This permits the CA to view your selected preferences. This feature is of great benefit if you have more than one relay user living in the household because each person can establish his/her own profile! If you travel, you are always able to access your profile from anywhere.

1. Customer Information

Please fill in all of the information in this section. This information will only be used by Customer Service staff.

2. Password + PIN (Required)

Your password prevents other people from changing any information on your profile without your permission. It must be 4 to 10 letters and/or numbers. A PIN is needed so the CA can view your customer profile when you make Internet relay calls, or when you use Remote Profile. It must be 4 numbers.

3. Making Relay Calls

This section allows you to select the way you **CONNECT TO** relay. *If you live with a person who answers relay differently than you, each person should create his/her own profile.*

Voice Carry Over (VCO) is ideal for a person who has difficulty hearing and has understandable speech. The VCO user speaks directly to the person they are calling. When the person s/he is calling responds, the Communication Assistant (CA) types everything that is heard for the VCO user to read.

Hearing Carry Over (HCO) is ideal for a person who can hear but is unable to speak. The HCO user types what s/he wants to say, and the Communication Assistant (CA) reads it to the caller. The HCO user then listens to the caller's response.

ASCII (Computer/TTY) is ideal for a person who uses a computer or a TTY with ASCII settings to communicate through the relay service.

Answering Relay Calls

This section allows you to select the way you want to **ANSWER** or receive your relay calls.

Important:
After your Customer Profile has been entered into the WYRS database, all relay calls made or received from your profiled phone number will connect automatically as listed on your Profile.

Section 3 does not apply if only making calls using Hamilton Relay Internet.

4. Long Distance Company–Check only one

If you do not pick a long distance company, all of your long distance calls will be billed through AT&T. Please contact Customer Service if the long distance company you use (or would like to use) is not listed on this form.

Section 4 does not apply if only making calls using Hamilton Relay Internet.

5. For every relay call I make, I want…

The following features may be helpful to some relay users. However, they are not necessary for all relay users.

ASL/English Call Translation – Native ASL relay users or people who do not feel comfortable with English can have the ASL Translator voice in correct English and type back in ASL word order. The Translator will translate for both the TTY user and the voice user unless given other instructions.

Slow Typing – Relay users who are visually impaired or who are new TTY users may find slow typing helpful. The CA will type slowly giving the reader more time to focus on the TTY screen.

No Abbreviations – Normally, the CA types many abbreviations during a relay call. For example, please = PLS, meeting = MTG, tomorrow = TMW and many others. By choosing "No Abbreviations", the CA will type word for word, without using abbreviations.

6. Speed Dialing

Write the name, area code and phone number of the people you frequently call. It's that simple! When you want to call that person, first connect to the CA and just tell the CA "Pls call Mom GA". You can have 10 people on your Speed Dial list.

For example: Mom 414-123-4567
Doctor 920-333-4455
Daycare 715-987-4561

When using Speed Dialing through Hamilton Internet Relay, leave the "Number you are Calling" box blank.

7. Greeting Features

The greeting feature(s) you choose will be used on <u>ALL RELAY CALLS.</u>

Use my First Name – If you select this feature, the CA will say your name as the call is introduced. For example: "This is Virgin Island Relay CA 4444 with a call from Bob. Are you familiar with the relay?" <u>If you live with another relay user, this will only work if each person creates his/her own profile</u>.

Deaf, Hard of Hearing, Speech Disabled, Deaf Blind – If you select this feature, the CA will tell the person you are calling that you are deaf, hard of hearing, speech disabled or Deaf Blind. For example: "This is Virgin Island Relay CA 4444 with a call from Bob who is deaf. Are you familiar with the relay?"

No Explanation of the Relay (NE) – If you select this feature, the CA will not explain how the relay works to the people you call. For Example: "This is Wyoming Relay RO 4444 with a relay call on line. One moment for your conversation to begin".

> VIRS uses the following language to explain relay. "The person calling you through the relay is simply typing their conversation and I will read it to you. When I say, "Go Ahead", it's your turn to talk. Then I will type everything I hear on your end of the line, so please talk slowly and directly to your caller. Please say, "Go Ahead", when you are finished speaking. One moment for your conversation to begin."

Do Not Identify the Relay (NI) – If you select this feature, the CA will not inform the person you are calling that you are using the relay. **This works best when a TTY user is calling someone who is familiar with the caller and knows how to use the relay.** If you choose "NI", you MUST also choose "MY HELLO" listed below.

My Hello – If you select this feature, the CA will read what you have written as a greeting on all calls. It is very important that the CA has something to say when the hearing person first answers the phone. This greeting is limited to 50 characters including spaces. **Only select this feature if you do not like any of the options above or if you picked "NI".**

NOTE: If you have a profiled greeting or if you type a greeting before the CA dials, the CA will read your greeting immediately. For example: "This is Virgin Island Relay CA 4444, with a call from (your greeting) Are you familiar with the relay? GA".

8. Call Restrictions or "Blocks"

You can stop someone from making long distance, international, 900, Directory Assistance or Operator Assisted relay calls from your home. This feature can save you money by protecting your phone bill. Once you choose the kinds of calls you want blocked, no one will be able to make those types of relay calls from your number. **When using Hamilton Relay Internet, Long Distance calls are FREE!**

When completed please return to:
VIRS Customer Service, PO Box 285, Aurora, NE. 68818
Fax 402-694-5110 ● **Customer Service** 866-883-4038 TTY/Voice

How to make long distance work for you.

Step One - Determine your call patterns.

Do you call long distance often?
If yes, where do you call? In-State? Out-of-State?
What time of day do you make these calls?

Step Two – Shop around.

Call different long distance companies. Tell them your long distance calling patterns. They may have a calling plan that fits your calling patterns.

Step Three – Choose the best rate plan that fits your call patterns.

Inform long distance carrier that you are a TTY/VCO user. Many long distance companies have TTY/VCO user discounts. Also tell them that you use the relay and want the same calling plan rates for your relay calls.

Step Four – Call your relay's Customer Service Department and tell them which long distance company you prefer to use.

Also tell Customer Service about any calling plans you have with your long distance company.

Step Five – Pay attention to rate changes.

Long distance companies are competing for your business. Rates and calling plans are constantly changing. From time to time, check back with your long distance carrier, as well as others, to see if they have a better plan that can save you more money.

****NOTE: IF YOU DO NOT CALL YOUR CARRIER AND LET THEM KNOW YOU ARE THEIR CUSTOMER AND USE RELAY YOU WILL BE BILLED AT A HIGHER RATE.**

Listed below are the Long Distance Companies that are currently offered through the relay and their customer service numbers:

APPENDIX B

Training

This Attachment contains Virgin Islands Relay Service's Communication Assistants Training class schedule. Such topics as confidentiality, handling of emergency and crisis calls, consequences of non-compliance to policies, and functions and roles of a CA are thoroughly explained. Virgin Islands Relay Service Spanish Communication Assistants must complete the same training as all traditional Communication Assistants plus pass additional test showing proficiency in the Spanish language.

Communication Assistants conduct themselves in a professional manner at all times while representing the Virgin Islands Relay Service. Through detailed procedures and a work environment and atmosphere which emphasizes quality and professionalism, Virgin Islands Relay Service is able to maintain its outstanding reputation for quality relay services.

Training Plan

Virgin Islands Relay Service helps each Communication Assistant excel at his or her job as a result of its hiring and training procedures. Before taking the first call, Communication Assistants are prepared to relay calls in such a fashion that exceeds FCC standards.

Time is allocated throughout the initial training process to instruct Communication Assistants on the proper phrasing of typed ASL "gloss", ASL style and grammar, tone of voice, hearing and speech disabled cultures, TTY etiquette, pertinent information about the needs of deaf, hard-of-hearing and speech disabled users, the role of the CA, (including training to relay the contents of a call as accurately as possible without intervening in communication) and operation of relay telecommunications equipment including answering machines and computerized services. This is done through videos, training seminars with staff who are familiar with the deaf and speech disabled communities, observation, participation in both simulated and live calls, and a variety of role play scenarios. Virgin Islands Relay Service CAs are well trained to effectively meet the specialized needs of hearing and speech disabled individuals as explained below.

Virgin Islands Relay Service uses a variety of trainers throughout its training period. Virgin Islands Relay Service has a Training Coordinator who is responsible for the overall program. This person does all the classroom training and leads role-play activities. In addition, Virgin Islands Relay Service deaf employees and Communication Assistants all play a role in training. Deaf employees teach Deaf culture while Communication Assistants share general knowledge about the relay and assist with role playing activities.

Disability/Relay/Deaf Culture Training

All relay service staff receive training devoted solely to disability issues, including ASL "gloss" and grammar, Deaf culture, issues relating to hard of hearing, late-deafened and speech-disabled users, dual sensory impaired users, diversity issues, ethics and confidentiality. Virgin Islands Relay Service has on staff several people who are very familiar with the deaf and speech disabled communities. Their expertise is shared during the training experience and is used on an on-going basis to refresh all Communication Assistants.

Speech to Speech Training

In order to become a STS CA, an individual must pass the same tests as traditional CAs, meet the strict STS criteria and pass an STS exam by successfully demonstrating the ability to understand a variety of speech patterns. Prospective STS CAs demonstrate their fluency in English as documented by the primary supervisor during their first 6 months of employment as regular (non STS) CAs. A CA must be recommended by the primary supervisor in order to apply for a STS CA position. Having met this requirement, those wishing to become STS CAs must complete specific testing of English language skills, specifically vocabulary, grammar and syntax as well as speech comprehension.

During the training, STS CAs learn about speech disabilities and are given specific strategies to use in order to facilitate calls between STS users and end users. STS CAs also receive detailed training on STS policies and procedures. As follow-up to the initial training, the STS Program Supervisor continually educates all STS CAs on speech disabilities, their respective implications and etiquette through the use of a STS newsletter, STS Resource Library materials (articles, books, videos, etc.) workshops, and in-service meetings.

Class Schedule

Day # 1		Day # 2		Day # 3		Day #4		Day # 5	
Intro to Relay - Terms	8:30-9:30	Quiz- Tone of Voice	8:30-9:00	Quiz-Hot Keys	8:30-9:00	quiz closing calls	8:30-9:00	quiz lang. 3 intervs due	8:30-9:00
Discuss Screen	9:30-10:00	TTY to Voice Practice	9:00-10:30	Voice-TTY	9:00-10:30	TTY-TTY & Practice	9:00-10:30	Voice Orig Ans Mach	9:00-10:30
Practice Logging on	10:00-10:30	Break	10:30-10:45	Break	10:30-10:45	Break	10:30-10:45	Break	10:30-10:45
Break	10:30-10:45	cont. TTY-V w/closings	10:45-12:30	Cont. Voice-TTY	10:45-12:30	**CA Service Role**	10:45-12:30	**CA Service Role**	10:45-12:30
Com. Effectively w/TTY-pg10	10:45-11:30	Lunch	12:30-1:00	lunch	12:30-1:00	**Telephone Service Skills**		**Listening Skills**	
Decorum	11:30-12:30	**CA Service Role (1)**	1:00-2:45	**Typing Drills**	1:00-2:00	Lunch	12:30-1:00	**Practice Activity**	
Lunch	12:30-1:00	Break	2:45-3:00	**Ergo mtg**	2:00-2:30	Recap All Calls	1:00-2:00	Lunch	12:30-1:00
Index Book	1:00-1:15	Obs sheets, IEC	3:00-4:00	Closing call review	2:30-3:00	Practice Profiles	2:00-3:00	Practice learned calls	1:00-3:00
Company's Overview	1:15-2:15	Speed dial, connect		Break	3:00-3:15	Break	3:00-3:15	and Profiles	
Introduce TTY to Voice	2:15-3:00	modes		**Typing Drills**	3:15-5:00	Call/**Typing Drills**	3:15-5:00	Break	3:00-3:15
Break	3:00-3:15	**Typing Drills**/Recap	4:00-5:00					**Typing**/Call Practice	3:15-5:00
Typing Drills	3:15-5:00	TTY to Voice		Homework study				Give Final Study Guide	
Homework Tone of Voice		Homework Hot Keys		closing calls		Homework Language		Homework Language	

Day # 6		Day # 7		Day # 8		Day # 9		Day # 10	
Quiz Language	8:30-9:00	quiz (based on need)	8:30-9:00	VCO-Voice	8:30-10:30	Call test Ans Mach	8:30-10:30	Review Recordings	8:30-10:30
Voice orig ans mach recap	9:00-10:00	TTY-Voice test (1)	9:00-11:30	VCO Ans Mach		Break	10:30-10:45	Break	10:30-10:45
TTY Orig ans mach intro	10:00-10:30	Typing/Shadowing/		Break	10:30-10:45	Voice-VCO (prof & no pr)	10:45-12:15	Remote Profile	10:45-11:15
Break	10:30-10:45	Interviews (incl break)		Cont w/VCO	10:45-12:30	711	12:15-12:30	Lormar Logic	11:15-12:00
TTY Orig Ans Mach	10:45-12:30	Game	11:30-12:30	Lunch	12:30-1:00	Lunch	12:30-1:00	Pager Calls	12:00-12:30
Lunch	12:30-1:00	Lunch	12:30-1:00	Q & A for Final	1:00-2:00	Dir Assist	1:00-2:00	Lunch	12:30-1:00
CA Service Role	1:00-3:00	Recording/Turbo Intrpt	1:00-3:00	**Deaf Culture/ASL**	2:00-4:00	Internet Calls	2:00-3:00	Game	1:00-1:30
Difficult Calls/Summary		Break	3:00-3:15	Break	4:00-4:15	Break	3:00-3:15	Live Calls(incl. break)	1:30-4:30
Break	3:00-3:15	Quality/Monitoring mtg	3:15-4:15	**Typing Drills**	4:15-5:00	Take live calls (pair)	3:15-5:00	Discuss Calls	4:30-5:00
911	3:15-4:15	**Typing**/call practice	4:15-5:00						
Typing/Practice calls	4:15-5:00							3 interviews due	

Day # 11		Day # 12		Day # 13		Day # 14		Day # 15	
HCO-Voice/Voice-HCO	8:30-10:30	VCO Call Tests	8:30-10:30	2 Line VCO	8:30-12:30	**Final /Index Book Due**	8:30-10:00	**Typing Drills**	3 hrs
HCO-TTY/TTY-HCO		Break	10:30-10:45	VCO-TTY		Remaining Interview Due		On Relay Floor	
Break	10:30-10:45	Captel/NY/OSD	10:45-12:00	TTY-VCO		Technical Session	10:00-10:30		
Long Distance	10:45-11:45	Lunch	12:00-12:30	Lunch	12:30-1:00	Relay Floor	10:30-12:30	Graduation	
Discuss Miscellaneous info	11:45-12:30	**Typing Drills**/Relay	12:30-5:00	**Typing Drills**/Relay	1:00-5:00	Lunch	12:30-1:00	Relay Floor Etiquette	
Lunch	12:30-1:00	Floor		floor		VCO-VCO	1:00-3:00	HR topics	
Oni Box	1:00-1:30					VCO-HCO/HCO-VCO			
Slam	1:30-2:30					Break	3:00-3:15		
Relay Floor (incl break)	2:30-5:00					Typing Drills/Relay Floor	3:15-5:00		

Company Overview-
Attendance -
Decorum-
Ergonomics-
Quality/Monitoring-
Technical Session-
Relay Floor Etiquette-
HR Topics -
Interviews - Trainees use this time to meet and get to know the sups and leads

19-Oct-06

APPENDIX C

CONTINGENCY/DISASTER RECOVERY PLAN

HAMILTON RELAY

Hamilton Relay Service's Disaster Recovery Plan follows. This plan allows Hamilton to deal with all types of natural and man-made problems including but not limited to terrorism and phone line cut accidents. This plan shows in detail the level of escalation which will be employed to deal with the problem and restore service. This plan is also designed to ensure that no aspect of relay service is impaired. Hamilton Relay Service's Disaster Recovery Plan establishes three levels of disaster recovery. As a result, Hamilton is prepared for all types of disasters.

Level One: The first and lowest level of disaster recovery would be implemented if less then 25% of a center's call volume is interrupted for thirty minutes or more.

Level Two: This plan would be implemented if 25% to 49% or more of a center's call volume is interrupted for thirty minutes or more.

Level Three: This is the highest priority disaster level. This plan would be implemented any time 50% or more of a center's call volume is Interrupted for thirty minutes or more.

If any of these plans is implemented and a problem occurs, escalating the situation to a higher level of service interruption, the next level of disaster recovery plan would be implemented.

Hamilton has defined specific time frames in which each action step of the disaster recovery plan should be enacted. A detailed record of each step taken as well as the time the step was put into action will be recorded.

Please refer to the Disaster Recovery Time Line located on the second page of each section.

Hamilton has the ability to overflow traffic between its relay centers. It is done automatically on a daily basis. During a disaster, this is done automatically but can be done manually to aid our recovery process, if necessary. Hamilton can reroute traffic through its relay switches or we have personnel trained to reroute the traffic at the network level. This can be done in a matter of minutes.

Disaster Recovery Timeline
Level One Disaster

The following steps should be implemented immediately.

Within 15 minutes of the disaster's inception the Supervisor on duty should contact:

Dixie Ziegler
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

and /or

Barb Handrup
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Greg Stephens
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Robert Patterson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

If deemed necessary, implement overflow procedure to route calls to the remaining center or centers that are still in operation. Determination will be made by one of the people above, to route all calls, or certain calls by toll-free number.

This level of disaster should have no impact on service. A primary requirement is to notify the Customer's Coordinator if a major problem occurs.

Name:	Email Address:	Phone Number(s):
Dave Sharp Virgin Islands Contract Administrator		340-715-8907

Disaster Recovery Timeline
Level Two Disaster

The following steps should be implemented immediately.

Within 5 minutes of the disaster's inception the Supervisor on duty should contact:

Dixie Ziegler
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Greg Stephens
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

and

Barb Handrup
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Robert Patterson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

If deemed necessary, implement complete or partial overflow procedure to route calls to the remaining center or centers that are still in operation. The determination will be made by one of the people above, to reroute calls at the Hamilton switch point or the network level.

A primary requirement is to notify the Customer's Coordinator if a major problem occurs.

Name:	Email Address:	Phone Number(s):
Dave Sharp Virgin Islands Contract Administrator		340-715-8907

Within one half hour of the inception of the disaster the Supervisor on duty should contact other key personnel:

Name:	Address:	Phone Number(s):
Diane Taylor	Address: City, State Zip Code	
Deborah Ducksworth	Address: City, State Zip Code	
Liza Dorsey	Address: City, State Zip Code This information has been redacted	This information has been redacted

Within two hours of the disaster or as soon as service is back online the following people will be notified by the Vice President of Relay, the Operations Manager or whomever they deem appropriate to perform this task. This notification will outline the problem, how it will be corrected and an approximate time the facility will be fully operational.

Name:	Email Address:	Phone Number(s):
FCC	Thomas.Chandler@fcc.gov	Disability Rights Office 202-418-1475 Phone

Disaster Recovery Timeline
Level Three Disaster

The following steps should be implemented immediately.

Within 5 minutes of the disaster's inception the Supervisor on duty should contact:

Dixie Ziegler
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Greg Stephens
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

and/or

Barb Handrup
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Robert Patterson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Complete overflow procedure to route calls to the remaining center or centers that are still in operation. Determination will be made by one of the people above, to reroute calls at Hamilton's switch point or at the network level.

A primary requirement is to notify the Customer's Coordinator if a major problem occurs.

Name:	Email Address:	Phone Number(s):
Dave Sharp Virgin Islands Contract Administrator		340-715-8907

Within one half hour of the inception of the disaster the Supervisor on duty should contact other key personnel:

Name:	Address:	Phone Number(s):
Diane Taylor	Address: City, State Zip Code	
Deborah Ducksworth	Address: City, State Zip Code	
Liza Dorsey	Address: City, State Zip Code This information has been redacted	This information has been redacted

Within two hours of the disaster or as soon as service is back online the following people will be notified by the Vice President of Relay, the Operations
Manager or whomever they deem appropriate to perform this task.

Name:	Email Addresses:	Phone Number(s):
FCC	Tom.Chandler@fcc.gov	Disability Rights Office 202-418-1475 Phone

Following is the contact information of Hamilton's emergency personnel:

Dixie Ziegler
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

John Nelson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Robert Patterson
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Greg Stephens
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Barb Handrup
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Deborah Ducksworth
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Liza Dorsey
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Within an hour all of the essential personnel will have been contacted and backup or replacement equipment needed will have been identified. Any outside resources, such as equipment vendors, will be contacted.

Backup or Replacement Equipment Needed:	Location of Backup or Replacement Equipment:
D4 channel bank All required channel back cards T1 CSU packs Switch T1 card Switch conference card	Nebraska Center Louisiana Center Wisconsin Center Georgia Center Maryland Center
Outside Resources: (name, address, phone numbers)	**Type of Assistance they can provide:**
Veritek Systems 972-423-3985 Emergent Network Solutions, Inc. 972-359-6600	Phone/on-site technical assistance for both centers. Parts and phone/on-site technical assistance for Relay Platforms.

Within 24 hours of the beginning of the disaster, file a written report with the affected States.

Within 2 days of service restoration a second report will be filed with the affected States.

Following the Disaster: Hamilton will follow the action steps listed below. The people that are responsible, the action steps to be taken, as well as the frequency of the action are listed below:

Action Step One:
Determine extent of equipment damage.

Order replacement equipment.

Person(s) Responsible:

Derek Williamson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Gary Bussey
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When:
Immediately after become operational

Action Step Two:
Determine new location for the switch and arrange temporary set-up

Person(s) Responsible:

Robert Patterson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Greg Stephens
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

John Nelson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Dixie Ziegler
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When:
Within 24 hours after the disaster.

Hamilton also has in place preventative measures to assist in the prevention of disasters. The people that are responsible, the action to be taken, as well as the frequency of the action are listed below:

Action Step One:
Have facilities in place to handle overflow and to provide back-up capabilities so that calls can be rerouted to the center or centers still in operation.

Person(s) Responsible:

Robert Patterson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Pat Shaw
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Gary Bussey
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Derek Williamson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When or How Often:
Test every third month: (January/April/July/October)

Action Step Two:
Review the disaster recovery plan monthly (15th of each month)

Person(s) Responsible:

Derek Williamson
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Barb Handrup
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Disaster Preparation: Following are the steps Hamilton takes to prepare for any type of disaster. The people that are responsible, the action to be taken, as well as the frequency of the action are listed below:

Action Step One:
Review plans and emergency (secondary) plans that reroute traffic to other centers.

Person(s) Responsible:

Derek Williamson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Barb Handrup
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When or How Often:
Monthly

How reviewed or tested:
Review switching procedures for overflow and back-up.

Action Step Two:
Review the disaster recovery plan monthly (15th of each month)

Person(s) Responsible:

Derek Williamson
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Barb Handrup
Address:
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When or How Often:
Monthly

How reviewed or tested:
Plan on file. Be sure all testing is up to date.

Action Step Three:
Test Overflow and back-up

Person(s) Responsible:

Pat Shaw
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

Derek Williamson
Address
City, State Zip Code
Phone:
Cellular:
This information has been redacted

When or How Often:
Monthly

How reviewed or tested:
Place calls – cause overflow

Level One Checklist			
Action Step Performed	Initials	Time	Date
Made initial contacts			
Initiated Overflow procedure			
Notified the appropriate agencies			
File final report			

Level Two Checklist			
Action Step Performed	Initials	Time	Date
Made initial contacts			
Initiated Overflow procedure			
Contacted other key personnel			
Initial report to appropriate agencies			
File final report			

Level Three Checklist			
Action Step Performed	Initials	Time	Date
Made initial contacts			
Initiated Overflow procedure			
Contacted other key personnel			
Notified the appropriate agencies			
Located back up equipment			
Filed complete report with State			
Filed concluding report with State			

APPENDIX D

TRS MINUTE SUMMARY BY STATE & YEAR

	Session Minutes		Conversation Minutes		Session	Conversation
Data Month	**Intrastate**	**Interstate**	**Intrastate**	**Interstate**	**Min Total**	**Min Total**
August 2005	239.92	11.48	40.85	8.21	251.40	49.06
September 2005	1,215.30	112.98	243.21	29.37	1,328.28	272.58
October 2005	1,765.17	134.92	533.67	89.59	1,900.09	623.26
November 2005	1,227.17	73.32	315.53	40.33	1,300.49	355.86
December 2005	1,293.67	144.72	391.38	111.38	1,438.39	502.76
	5,741.23	477.42	1,524.65	278.87	6,218.65	1,803.52
1	1,148.25	95.48	304.93	55.77	1,243.73	360.70
January 2006	1,564.17	147.44	560.69	108.87	1,711.61	669.56
February 2006	1,172.95	107.40	369.00	80.35	1,280.35	449.35
March 2006	1,478.61	75.66	549.92	54.51	1,554.27	604.43
April 2006	1,210.19	24.05	330.79	18.48	1,234.24	349.27
May 2006	1,538.61	402.45	500.05	326.24	1,941.06	826.29
June 2006	1,517.39	36.86	591.14	21.81	1,554.25	612.95
July 2006	1,252.79	30.74	414.06	19.14	1,283.53	433.20
August 2006	1,217.73	71.84	372.53	43.19	1,289.57	415.72
September 2006	879.61	14.99	162.82	7.68	894.60	170.50
October 2006	1,488.83	25.82	473.66	5.59	1,514.65	479.25
November 2006	1,672.06	70.51	281.82	51.37	1,742.57	333.19
December 2006	949.14	22.00	202.22	11.03	971.14	213.25
	15,942.08	1,029.76	4,808.70	748.26	16,971.84	5,556.96
1	1,328.51	85.81	400.72	62.36	1,414.32	463.08
January 2007	1,105.95	8.60	350.45	5.55	1,114.55	356.00
February 2007	1,060.01	124.89	403.39	105.95	1,184.90	509.34
March 2007	1,048.70	179.28	363.61	150.84	1,227.98	514.45
April 2007	709.42	23.56	217.92	18.54	732.98	236.46
May 2007	584.36	53.50	183.64	42.76	637.86	226.40
June 2007	667.48	100.22	196.35	86.47	767.70	282.82
	5,175.93	490.04	1,715.36	410.11	5,665.97	2,125.47
1	862.65	81.67	285.89	68.35	944.33	354.25

Virgin Islands Performance Summary

		Avg Ans Seconds	% Answered in 10 seconds	
VI	Aug 05	0.3	95	99
VI	Sep 05	0.3	98	99
VI	Oct 05	0.6	96	98
VI	Nov 05	0.4	96	98
VI	Dec 05	0.4	96	98
Avg for 2005		**0.4**	**96**	**98**
VI	Jan 06	0.1	99	100
VI	Feb 06	0.3	98	99
VI	Mar 06	0.3	97	99
VI	Apr 06	0.4	97	99
VI	May 06	0.5	96	98
VI	Jun 06	0.5	96	98
VI	Jul 06	0.3	98	99
VI	Aug 06	0.6	95	98
VI	Sep 06	0.4	97	98
VI	Oct 06	0.4	97	99
VI	Nov 06	0.3	98	99
VI	Dec 06	0.2	99	100
Avg for 2006		**0.4**	**97**	**99**
VI	Jan 07	0.2	98	99
VI	Feb 07	0.3	98	99
VI	Mar 07	0.2	98	99
VI	Apr 07	0.3	99	99
VI	May 07	0.2	98	99
VI	Jun 07	0.3	98	99
Avg for 2007		**0.3**	**98**	**99**

8/3/07

Usage Summary

State	Data Month	Inbound	Answered	Outbound	Complete
VI	August 2005	480	463	41	30
VI	September 2005	2,293	2,263	160	85
VI	October 2005	2,854	2,798	240	178
VI	November 2005	2,322	2,274	166	112
VI	December 2005	2,186	2,144	170	133
	YTD Total	**10135**	**9942**	**777**	**538**
VI	January 2006	2,187	2,173	241	183
VI	February 2006	1,787	1,769	155	128
VI	March 2006	1,939	1,905	224	171
VI	April 2006	1,989	1,949	188	140
VI	May 2006	2,009	1,970	353	251
VI	June 2006	1,944	1,903	262	193
VI	July 2006	1,957	1,929	188	130
VI	August 2006	1,882	1,833	182	126
VI	September 2006	1,812	1,783	112	67
VI	October 2006	1,983	1,945	229	166
VI	November 2006	2,303	2,284	185	127
VI	December 2006	1,734	1,717	137	78
	YTD Total	**23526**	**23160**	**2456**	**1760**
VI	January 2007	1,710	1,698	169	131
VI	February 2007	1,530	1,515	153	100
VI	March 2007	1,630	1,617	154	110
VI	April 2007	995	992	70	59
VI	May 2007	942	934	82	62
VI	June 2007	1,035	1,027	98	72
	YTD Total	**7842**	**7783**	**726**	**534**
Grand Total		**41,503**	**40,885**	**3,959**	**2,832**
	Average per month	1,804	1,778	172	123

APPENDIX E

CA QUALITY ASSURANCE PROGRAM

RELAY HAMILTON
That's what I'm talking about

Monitoring Score

CA Name: _____

CA Number : _____ Date: _____

Call Type: _____ to _____

State: _____ Station: _____

Formal Monitoring Worksheet

Call Set Up

Category	P/F	Feedback
Response time		
Dials correct number with area code		
Checks terminator profile before dialing		
Observes originator profile		
Follows specific customer instruction		
Properly connects call on both sides		

ıll Content

Category	P/F	Feedback
Accurate typing		
Uses customer friendly language		
Maintains speed/control of voice consumer		
Voices text consumers conversation verbatim		
Voices in complete phrases or thoughts		
Types voice consumers conversation verbatim		
Accurately conveys conversation tone and inflection		
Keeps the text consumer informed		
Properly executes all technical procedures		
Focuses only on call		
Remained unbiased and uninvolved in the call		
Properly handled Customer Service issues		
Used a tone of voice description		

Recordings

Category	P/F	Feedback
Recordings recorded		
Began typing the recording once recognized		
Recordings typed verbatim		
Correct hot keys sent pertaining to call progress		
'sumers' requests properly executed		
Consumer kept informed of process		
Technical procedures regarding recording process followed		

Call Closing

Category	P/F	Feedback
Properly closed the call		
Voiced proper closing to voice consumer		
Efficiently and properly disconnected the call		

Number Passed (divided by) ▸	Number Answered (equals) ▸	Final Score

Monitor's Feedback:_____

_____

_____

_____

_____

CA's Feedback_____

_____

_____

_____

_____

CA Signature: _____ **Date:** _____

Monitor's Signature: _____ **Date:** _____

Quick Check—Informal Monitoring

CA Name:_____ CA Number:_____ Date/Time_____
State:_____ Call Type:_____ to _____

Category	Points	Observations
Uses correct hot keys		
Uses consumer friendly language		
Uses and voices abbreviations correctly		
Proper use of GA's and SK's		
Focuses only on call		
Types verbatim		
Typos and accuracy		
Keeps voice user at a typable speed		
Voices verbatim		
Voices in complete phrases or thoughts		
Voice tone and inflection		
Keeps users informed		
Follows instructions/Observes Profile		
Follows All Technical Procedures		
Recording Feature		

Score : _____ **Error Count :** _____

Quick Check—Informal Monitoring

CA Name:_____ CA Number:_____ Date/Time_____
State:_____ Call Type:_____ to _____

Category	Points	Observations
Uses correct hot keys		
Uses consumer friendly language		
Uses and voices abbreviations correctly		
Proper use of GA's and SK's		
Focuses only on call		
Types verbatim		
Typos and accuracy		
Keeps voice user at a typable speed		
Voices verbatim		
Voices in complete phrases or thoughts		
Voice tone and inflection		
Keeps users informed		
Follows instructions/Observes Profile		
Follows All Technical Procedures		
Recording Feature		

ore : _____ **Error Count :** _____

Hamilton Telecommunications
Relay Floor Decorum Report Form

Decorum Score

CA Name: _____ CA #: _____ Date: _____

Scoring:

1	Needs Improvements	2.2-3.0	Exceeds Standards
2	Meets Standards	1.8-2.1	Meets Standards
3	Exceeds Standards	<1.8	Needs Improvements

Category	**Pts**	**Comments**
Maintains a reasonable voice tone		
Keeps headset on at all times/Does not stretch headset cord beyond cubicle		
Productivity		
Returns from breaks and lunch on time		
Keeps workstation clean		
Focuses only on call		
Acts in a professional manner		
Adheres to the Dress Code		

Total Points:	*# Answered:*	*Citations -.10:*	*Complaints -.10:*	*Compliments +.10:*	*Decorum Score:*

Supervisor Comments:

_____
_____
_____
_____

CA Comments: _____
_____
_____
_____
_____

CA Signature: _____ Date: _____
Supervisor Signature: _____ Date: _____

APPENDIX F

2006-07 COMPLAINT LOGS

Virgin Islands Relay TRS Consumer Complaint Log Summaries for June 1, 2005 through May 31, 2006 CG DOCKET NO. 03-123

Hamilton Relay, with corporate offices located at 1001 12th Street, Aurora, NE 68818, is under contract with Innovative Telephone to provide Telecommunications Relay Service to the Virgin Islands.

Hamilton tracks all complaints and all other customer service activity for the Virgin Island Telecommunications Relay Services. Virgin Island's complaint summary is associated with the following database categories:

- Miscellaneous External Complaints
- LEC External Busy
- 911 External Calls
- No Notice of How to Complain to FCC
- CA Accuracy/Spelling/Verbatim
- CA Gave Wrong Information
- CA Did Not Keep User Informed
- CA Hung Up on Caller
- CA Misdialed Number
- CA Typing Speed
- Didn't Follow Voice Mail/Recording Procedure
- CA Typing
- Improper Use of Speed Dialing
- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
- Improper Handling of Three Way Calling
- Caller ID Not Working Properly
- Improper Use of Customer Data
- Fraudulent/Harassment Call
- Replaced CA Improperly in Middle of Call
- Didn't Follow Emergency Call Handling Procedure
- CA Didn't Follow Policy/Procedure
- Confidentiality Breech
- Spanish to Spanish Call Handling Problems
- Miscellaneous Service Complaints
- Ringing/No Answer
- Speech to Speech Call Handling Problems
- Connect Time (TTY-Voice)
- Busy Signal/Blockage
- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems

- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access

Hamilton processes any complaint, which originates via e-mail, fax, telephone, regular mail, outreach events, at the workstation, etc. Hamilton normally provides a resolution to all complaints within 72 hours. There were no complaints filed during this period.

Virgin Islands Relay TRS Consumer Complaint Log Summaries for June 1, 2006 through May 31, 2007 CG DOCKET NO. 03-123

Hamilton Relay, with corporate offices located at 1001 12th Street, Aurora, NE 68818, is under contract with Innovative Telephone to provide Telecommunications Relay Service to the Virgin Islands.

Hamilton tracks all complaints and all other customer service activity for the Virgin Island Telecommunications Relay Services. Virgin Island's complaint summary is associated with the following database categories:

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- CA Typing
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- Poor Vocal Clarity/Enunciation
- Improperly Handled ASL or Related Culture Issues
- Improper Use of Call Release
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- ASCII/Baudot Break-down
- STS Break-Down
- HCO Break-Down
- Relay Not Available 24 Hours a Day
- 711 Problems

- VCO Break-Down
- Miscellaneous Technical Complaints
- Line Disconnected
- Carrier of Choice not Available/Other Equal Access

Hamilton processes any complaint, which originates via e-mail, fax, telephone, regular mail, outreach events, at the workstation, etc. Hamilton normally provides a resolution to all complaints within 72 hours. This complaint is resolved.

The Virgin Islands Relay 2007 FCC Complaint Report

6/1/06 to 5/31/07

Technical Complaints--Carrier Choice not Available/Other Equal Access

Inquire Date 3/27/2007

Record ID 13563
Call Taken By
Customer Service
CA Number
Responded By Tina
Response Date
3/27/2007
Resolution 3/27/2007

Customer requested ICC Telephone as their long distance carrier.

Customer Service explained that ICC Telephone is not a participating carrier through the relay and offered to set a profile with an alternate carrier. Customer Service also explained that ICC Telephone would be contacted. Customer refused the profile and stated not to contact ICC. Customer was satisfied. ICC Telephone is still not a participating carrier as of 5/31/07.
